



INSTITUTE FOR  
REFORMING GOVERNMENT

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# BUREAUCRACY IN THE SHADOWS:

THE HIDDEN FLOW OF FEDERAL GUIDANCE  
TO WISCONSIN STATE AGENCIES

BY JAKE CURTIS AND MATT KISTING

## ABOUT THE INSTITUTE FOR REFORMING GOVERNMENT

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The Institute for Reforming Government, along with its partner organization IRG Action Fund, is focused on developing free-market and limited-government reforms, taking action on them, and getting results for Wisconsin. Founded in 2018, IRG has quickly grown into one of the state's largest think tanks, boasting an elite policy team with decades of experience in state and federal government, trade associations, and statewide campaigns. Most importantly, IRG gets results for the conservative movement in Wisconsin.



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## EXECUTIVE SUMMARY

Wisconsin has long led the nation in regulatory reform, beginning with Governor Scott Walker's landmark efforts to rein in unelected bureaucrats and restore policymaking power to elected legislators. Despite these reforms, federal agencies continue to influence state policy through informal "guidance documents" that often carry the weight of regulation without public oversight or legislative approval. This report from the Institute for Reforming Government examines how such federal guidance quietly shapes decisions across five major state agencies—the Departments of Natural Resources, Health Services, Agriculture, Transportation, and the Wisconsin Elections Commission—revealing at least 14 instances where Washington's directives guided state action or rulemaking. From environmental justice initiatives to Medicaid eligibility rules and election administration, these examples show how unelected federal officials can steer Wisconsin policy in ways that weaken state sovereignty and accountability. The report calls for renewed legislative oversight, including agency reporting requirements and committee review of federal guidance, to ensure that Wisconsin's policies reflect the will of its voters rather than the preferences of distant bureaucrats.



## ABOUT THE AUTHORS



**JAKE CURTIS** | *General Counsel and Director of CIO*

Jake brings a unique skill set to IRG by drawing on his years of experience as a lawyer, strategic advisor, and public official to navigate the intersection of law and policy. Throughout his career he has focused on government relations matters for both public and private sector clients, representing dozens of local units of government and handling administrative matters before WERC, DWD, ETF, DNR, DFI, DATCP and DPI.

Jake's diverse legal experiences have included practicing over a decade in private practice, including at two of Wisconsin's largest firms, serving as the Chief Legal Counsel at the Wisconsin Department of Natural Resources under Governor Scott Walker, as a policy advisor to a Wisconsin State Senator, and leading a groundbreaking litigation initiative at the Wisconsin Institute for Law & Liberty.

Jake is a graduate of the University of Wisconsin – Eau Claire, B.A., *summa cum laude*, 2005, the University of Wisconsin Law School, *cum laude*, 2008, the United States Air Force, Officer Training School, 2021, and the United States Air Force, The Judge Advocate General's Corps, 2022.



**MATT KISTING** | *Hamilton Roddis Administrative Law Fellow*

A 2L at the University of Wisconsin law school, Matt joined IRG for the 2025 summer to conduct Administrative Law research. He is the current treasurer for his law school's federalist society chapter.





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# INTRODUCTION

Since 2011, Wisconsin has served as a model for states interested in enacting regulatory reforms. Throughout the Governor Scott Walker Administration, Wisconsin conservatives enacted some of the boldest reforms in the nation, all geared to protecting the prerogatives of Wisconsin legislators to actually set policy for the state, as opposed to relying on unelected bureaucrats, as well as preventing the federal government from exerting undue influence over state policy.

Despite the shifting political landscape in Wisconsin, many Wisconsinites still agree that bureaucrats should be viewed warily, some even going so far as to registering agreement that unaccountable bureaucrats are a greater “threat to democracy” than many of the other “threats” portrayed by the media. IRG polling from early 2025 establishes the following - voters remain focused on reigning in the power of the bureaucracy with 32% saying that the Legislature should make important policy decisions and only 8% favoring bureaucrats at state agencies. Furthermore, 76% of voters believe voters and their elected officials should have a chance to overturn burdensome regulations. This IRG polling consistently shows Wisconsinites prefer that the Legislature, not bureaucrats, control the rulemaking process. And if they don’t trust Wisconsin bureaucrats, then they almost certainly don’t trust nameless and faceless bureaucrats from Washington D.C.

The overall success of Wisconsin’s administrative reform revolution was reflected in the State Policy Network’s (“SPN”) Center for Practical Federalism Federalism Scorecard. Wisconsin ranked second in SPN’s 2023 report and leapfrogged Utah in 2024, ranking as the state least likely to be impacted by federal pressure. However, as detailed below, while Wisconsin has many safeguards in place to prevent the federal government from exerting undue influence over state policy, a key tool remains in the hands of federal officials that if not guarded against, can result in devastating consequences to state prerogatives - guidance documents.

As IRG and Governor Walker have explained, the Walker Administration established a clear framework other states should follow:

*Fueled by grassroots energy and the desire to reform state government, in 2011 Wisconsin set off on a bold course. While much attention was focused on the historic Act 10 legislation that wrested away bargaining power from public sector unions to the benefit of Wisconsin taxpayers, the Walker Administration began working with reform-minded legislators to address the administrative state that for far too long had left state agencies with nearly limitless power to exert policy preferences over the will of the elected Legislature.*

*First, 2011 Act 21 provided that no agency could implement or enforce any standard, requirement, or threshold (including as a term or condition of any license it issued) unless such an action was explicitly required or permitted by statute or rule. Implied or perceived authority would no longer be the norm. Additionally, each proposed rule would require state agencies to submit a “statement of scope” to the governor for his review. An economic-impact analysis relating to specific business sectors, public-utility ratepayers, local government units and the state’s economy as a whole was also required.*

*Other key acts followed. 2017 Act 39 required that agencies submit a proposed rule to the Legislative before a scope statement expired, resulting in certainty to the regulated community and a 30-month deadline. 2017 Act 57 was the state version of the REINS Act. While long a policy goal of conservatives nationwide, Wisconsin became the first state to enact*



such a reform (just last month Kansas became the second). Numerous Congresses have failed to turn this into a reality at the federal level. Wisconsin agencies are required to determine whether a proposed rule would impose \$10 million or more in implementation and compliance costs over a two-year period. In the event such a finding is made, an agency is prohibited from promulgating the rule absent authorizing legislation or germane modification to reduce the costs below the threshold. Solidifying the connection to Act 21, Act 57 also required that the Department of Administration review an agency's scope statement prior to presentation to the Governor. Finally, 2017 Act 108 created an expedited process for the repeal of certain "unauthorized rules."

On top of these acts, the Wisconsin Supreme Court issued its groundbreaking decision in *Tetra Tech v. Wisconsin Department of Revenue*. The Court's lead opinion, authored by former Justice Daniel Kelly (appointed to the Court by Governor Walker) ended its "practice of deferring to administrative agencies' conclusions of law." The Legislature ultimately codified the new standard in 2017 Act 369.

While Wisconsin made great strides toward maintaining control over the administrative state by empowering state legislators to exercise real oversight over the rulemaking process, the work is not done. Legislators still do not have a grasp on the flow of federal guidance to state agencies. As state agencies regularly communicate with their federal counterparts, elected officials are left without the full picture of how the federal bureaucracy is influencing Wisconsin policy. Without specific public records requests, legislators are left in the dark.

***"The influence the federal government exerts over state agencies in Wisconsin is staggering."***

**Legislators need to be informed about any and all federal guidance issued by federal bureaucrats looking to influence state policymaking.** Further, the center-right grassroots, regulated communities, and even media outlets (at least those that remain interested in objectively reporting on outside influences to state operations) can also play a critical role in highlighting examples of federal agencies attempting to influence state counterparts by pushing federal guidance.

This need for robust oversight is now all the more critical in light of recent decisions from the decidedly progressive Wisconsin Supreme Court. Following the issuance of several decisions during the last term (namely *Evers v. Marklein*, (2025 WI 36)), the Legislature's Joint Committee for the Review of Administrative Rules ("JCRAR") has one less tool in its "administrative toolbox." The Court examined JCRAR's authority to pause, object, indefinitely object, suspend, or repeatedly suspend administrative rules and held these statutory authorities violated the Wisconsin Constitution's requirements of bicameralism and presentment. Without this important tool, it is now even more critical that the Legislature exercise robust authority oversight over any federal guidance that may be used by Wisconsin agencies to set state policy by way of administrative rules.

This report analyzes examples of federal guidance issued during the previous Administration to five Wisconsin state agencies, many of which represented overlap with federal agency priorities: (i) Wisconsin Department of Natural Resources; (ii) Wisconsin Department of Health Services; (iii) Wisconsin Department of Agriculture, Trade and Consumer Protection; (iv) Wisconsin Department of Transportation; and (v) Wisconsin Elections Commission. Across the five Wisconsin agencies, 14 federal guidance documents were issued by federal agencies that directly resulted in substantive action by Wisconsin state agencies, enabling the agencies to bypass any real oversight by the Wisconsin Legislature. In at least one case, a Wisconsin state agency relied on a non-governmental entity to directly formulate a proposed rule. With at least another dozen state agencies not included in this report and the examples below just a sampling of the publicly available federal guidance documents (nevermind those that are not publicly available), **the influence the federal government exerts over state agencies in Wisconsin is staggering.**

### Environmental Justice

In 2022, the Environmental Protection Agency created a guidance document to encourage states to promote environmental justice in state-implemented programs.<sup>1</sup> The guidance urges states to pursue environmental justice by:

- Engaging disadvantaged communities early and often in decision-making processes.
- Focusing enforcement efforts in communities disproportionately affected by environmental hazards to ensure compliance and protection.
- Using EPA tools and data to assess the cumulative impacts of various environmental stressors on vulnerable communities and prioritizing actions to mitigate these impacts.
- Going beyond minimum legal requirements for data collection and voluntarily submitting this data to the EPA to support federal efforts and prioritize regulatory actions.
- Aligning state-level enforcement with federal civil rights statutes to address both intentional discrimination and those policies or practices that have unjustified discriminatory effects on certain communities.

In 2023, WIDNR utilized this EPA guidance to evaluate Wisconsin's construction permitting process and determine if environmental justice is appropriately addressed in the current process.<sup>2</sup> Later that year, DNR gave a presentation to its Air Management Advisory Group highlighting the EPA guidance again and noting that Environmental Justice would be a top priority for the department for 2024.<sup>3</sup>



### Air Permits and Regulations

In 2016, EPA issued guidance to the Iowa DNR addressing whether emissions from manufacturer engine testing in the production of nonroad vehicles are considered stationary source emissions or mobile source emissions under the Clean Air Act.<sup>4</sup> The EPA determined that emissions from nonroad vehicle engines are considered mobile source emissions at all points in the production process and are not subject to stationary source emission permitting requirements.

In 2021, WIDNR utilized the 2016 EPA guidance when asked to clarify Wisconsin's regulation of nonroad vehicle engine emissions.<sup>5</sup> In the discussion, DNR acknowledged that the 2016 guidance had been adopted by other states in updating emissions standards but chose to partially reject the EPA guidance, noting that the guidance is non-binding and states have the ultimate say over emissions permitting. DNR concluded by stating that fully assembled nonroad vehicle emissions were exempt from stationary source emission limits, however emissions from partially assembled vehicles would be considered stationary source emissions.

## Requirements for State Grant Applicants

In 2024, the Biden Administration issued revisions to the federal funding grant application process.<sup>6</sup> Changes include:

- Using plain language in Notice of Funding Opportunities and permitting federal awards to be translated into languages other than English.
- Raising Single Audit threshold from \$750,000 to \$1,000,000 per fiscal year which means that more local governments will no longer have to submit a Single Audit, which reduces transparency and the ability for community members to understand how reliant their government is on federal dollars.
- Pushing for funding to be used for data collection and reporting along with covering more administrative costs.
- Affording Tribal recipients more latitude to self-audit and rely on indigenous knowledge in lieu of scientific or economic measures.
- Enabling Tribal applicants to circumvent requirements that they receive consent for their grant applications from affected states.

WIDNR operates a Boating Infrastructure Grant (BIG) Program, and states that projects that are inconsistent with Federal Cost Principles are ineligible for funding.<sup>7</sup> Rather than defining cost principles required for state grants, DNR relies on the federal model. Thus, when changes are made to federal cost principles such as in 2024, those changes automatically take effect for state grant programs relying on the federal cost principles to determine applicant eligibility.



### Groundwater Standards

Wisconsin Chapter 160 governs how state groundwater quality standards are set.<sup>8</sup> Established in the 1980s, the legislature amended the process to require that the Department of Health Services provide recommended groundwater standards for contaminants to the Department of Natural Resources to adopt through formal rulemaking.

In 2025, DHS issued recommended updates to groundwater standards for six per- and polyfluoroalkyl substances (PFAS).<sup>9</sup> Under Chapter 160, DHS must adopt the federal standard for each groundwater contaminant if a standard exists, unless there is significant information regarding the contaminant that was not considered when the current federal standard was adopted. Here, a federal standard existed for five of the PFAS that DHS sought to regulate. In each instance, DHS evaluated relevant scientific data and concluded that no significant information existed to recommend a figure other than the current federal standard. For the final contaminant DHS sought to regulate, Perfluorobutanesulfonic acid (PFBS), no federal standard nor state standard existed previously. Chapter 160 requires DHS to recommend a standard based on an Acceptable Daily Intake (ADI) number from the EPA, if one exists. Here, EPA issued an ADI for PFBS in 2021 of 2,000 nanograms per liter, and DHS recommended that number as the state maximum contaminant level.

### Automatic Medicaid Renewals

In August of 2023, the Centers for Medicare and Medicaid Services (CMS) sent out a guidance document to all 50 states requiring that states complete administrative renewals at an individual level rather than a household level.<sup>10</sup> Thus, if any household member can have their Medicaid and CHIP eligibility automatically extended using information from existing data sources, states must complete an administrative renewal for that individual. Other individuals within the household may then need to complete a regular renewal.

In November of 2023, DHS issued Operations Memo 23-40, informing that DHS would conduct automatic Medicaid and CHIP renewals at the individual level in order to comply with new federal requirements.<sup>11</sup>

In November of 2024, CMS published a 78-page informational bulletin detailing requirements for conducting ex parte renewals of Medicaid and CHIP eligibility, further



regulating how states conduct this process.<sup>12</sup> While the guidance reinforces existing statutory requirements for states to attempt ex parte renewals and ensure procedural safeguards, it introduces new and restrictive mandates that limit state flexibility. States are now required to use all available data sources, regardless of reliability, before requesting verification documents or other supplementary information. Additionally, the guidance prohibits states from excluding specific populations, such as childless adults, from the ex parte renewal process, even when verifying their eligibility electronically presents challenges. Previously, states had the discretion to determine the reliability of data sources and exclude certain populations, allowing them to tailor processes to maintain program integrity.

Medicaid law requires states to ensure that individuals remain eligible for Medicaid coverage while complying with basic procedural safeguards, including advance notice and an opportunity for a fair hearing before adverse actions. The statute does not prescribe the specific methods or data sources states must use to verify eligibility or mandate inclusion of all populations in ex parte renewals. By imposing these new obligations without statutory backing, CMS appears to exceed its authority and undermine state flexibility in implementing Medicaid program requirements.

### **Medicaid Eligibility for Peer Support Services**

In 2007, CMS issued State Medicaid Director Letter #07-011, which recommended to states for peer support services to be provided as a component of a comprehensive mental health or substance use service.<sup>13</sup> Under certain conditions laid out in the CMS letter, peer support services would be eligible for federal reimbursement of Medicaid funds.



In 2024, DHS proposed CR 24-081, establishing criteria for “peer recovery coaches” in Wisconsin.<sup>14</sup> Based in part on criteria established by 2019 Wis. Act 122, DHS established additional criteria based on SMDL #07-011, as the department concluded that criteria established for peer recovery coaches in Act 122 were likely insufficient for Federal Medicaid reimbursement.

## **Raw Milk**

For over 100 years, the U.S. Department of Health and Human Services and the Food and Drug Administration have coordinated to publish the Pasteurized Milk Ordinance, establishing recommended standards for states to adopt for commercial milk products. The PMO is published every few years with the latest recommendations for states to adopt. Latest editions include the 2023 PMO and the 2019 PMO.<sup>15</sup>

In 2024, DATCP introduced CR 24-086, seeking to align Wisconsin's milk standards with the recommendations laid out in the 2019 PMO.<sup>16</sup> Although state adoption of PMO recommendations is voluntary, there is significant pressure to do so. Under the purview of the FDA is the Interstate Milk Shippers Program, a program designed to ensure PMO compliance of all milk products subject to interstate commerce. All 50 states are currently enrolled in the IMS program, and thus must adopt the latest revisions to the PMO as a condition of enrollment. Should a state choose not to adopt the latest PMO revisions, they would lose their position in the IMS program, and their residents could not sell milk products in interstate commerce to states within the IMS program. Using the Commerce Clause, the FDA has established complete regulatory control over milk products sold in the U.S., as no state could afford to withdraw from the IMS program by themselves. Unless a coordinated effort is made to reject the IMS program, this regulatory scheme will continue to take effect.

## **Public Pools**

In 2018, the CDC released the 3rd edition of the Model Aquatic Health Code, a 195-page comprehensive guidance document relating to aquatic facilities.<sup>17</sup> This guidance was released "to assist interested parties in improving the health and safety at public aquatic facilities."

In 2022, DATCP introduced CR 22-021, a rule which revised several provisions of chapter ATCP 76 which regulates safety, maintenance, and operation of public pools and water attractions.<sup>18</sup> Within the rule text, the department made specific reference to the 2018 Model Aquatic Health Code as a basis for the revisions.

## **Camps**

In 2013, the FDA released a recent version of the Model Food Code, a guidance document recommending safety standards for food service industries.<sup>19</sup> In 2010, the U.S. Consumer Product Safety Commission released the 2010 Public Playground Safety Handbook, guidance to recommend safety standards for playground equipment.<sup>20</sup>

In 2021, DATCP introduced CR 21-109, a rule to update chapter ATCP 78 which regulates recreational and educational camps.<sup>21</sup> This rule included several revisions, including updated terms and definitions within the chapter, a new reporting requirement of events requiring an EMS response, and modernizing recordkeeping requirements for camper medications. Within the rule text, the department made specific reference to the 2013 Model Food Code and the 2010 Public Playground Safety Handbook as a basis for the revisions.

### Bridge Formula Program

In 2022, the U.S. Federal Highway Administration issued guidance to states upon the passage of the Bipartisan Infrastructure Law in November of 2021. One such guidance document was the Bridge Formula Program Implementation Guidance Memo, which made recommendations to states for how BFP funds should be used. Such recommendations include:

*The FHWA encourages the use of BFP funds—including for projects that involve new highway bridge construction—for projects that address equity, barriers to opportunity, challenges faced by individuals and underserved communities in rural areas, or restoring community connectivity. The FHWA also encourages the use of this funding to address the needs of highway bridges that impede the mobility of goods (e.g. freight) or services (e.g. emergency response and school bus) due to load or other operational restrictions. The FHWA also encourages the use of this funding—including for projects that involve new highway bridge construction—for projects that are designed and implemented to be resilient to multiple hazards and risks, including climate change, and that reduce greenhouse gas emissions relative to baseline conditions, including through the use of lower carbon materials and reducing vehicular traffic by accommodating multimodal use.*

These recommendations largely followed from the broader 2021 FHWA guidance, “Policy on Using Bipartisan Infrastructure Law Resources to Build a Better America”, which outlined priorities for BIL funds across all infrastructure areas.

In 2022, this memo was constituted to be a rule by the Government Accountability Office, due to its impact on state and local transportation policies. In 2025, the Trump administration repealed the 2021 memo, citing conflict with congressional intent and the APA. However, the Trump administration has not yet rescinded the 2022 BFP Implementation Memo.

In 2025, the Wisconsin Department of Transportation introduced CR 25-022, rule changes for inspection standards for local bridge program. This rule makes reference to 2022 BFP Implementation Memo and ensures proposed rule changes are consistent with the memo.

### Motorcycle Safety

The Motorcycle Safety Foundation is a nationally recognized, not-for-profit organization that is sponsored by various motorcycle manufacturers and distributors. It produces a widely-used series of courses in motorcycle safety and operation.





In 2023, WisDOT proposed CR 23-043 to amend ch. Trans 129, regulations which govern motorcycle licensing and courses in Wisconsin. One of the revisions introduced amended state requirements for motorcycle course curriculum to reflect the curriculum of the Motorcycle Safety Foundation Basic Rider Course.

## Public Safety Campaigns

The Highway Safety Act requires states to adopt updates to the Manual on Uniform Traffic Control Devices (MUTCD) or similar standards within two years of release or risk a 10 percent reduction in federal highway-aid funds. The Bipartisan Infrastructure Law contained a requirement for an updated MUTCD within 18 months of the bill's enactment and then updates every four years.

The most recent updates to the MUTCD went through the notice-and-comment period and include guidance under the standard mandating that traffic control messages have priority over traffic safety campaign messages:

*A CMS (changeable message sign) should not be used to display a traffic safety campaign message if doing so could adversely affect respect for the sign. Messages with obscure or secondary meanings, such as those with popular culture references, unconventional sign legend syntax, or that are intended to be humorous, should not be used as they might be misunderstood or understood only by a limited segment of road users and require greater time to process and understand. Similarly, slogan-type messages and the display of statistical information should not be used.*

**The use of short witty statements to convey a safety message has become popular with some local and state transportation agencies. Several states and members of Congress expressed concern about the restrictions.** Federal agency spokespeople responded to news outlet inquiries explaining that the guidance is a recommendation for state and local transportation departments but not mandatory. The language in the guidance, however, says “should not,” making it liable to be interpreted by recipients as required rather than optional.

In 2023, WisDOT published a draft of the Wisconsin Manual on Uniform Traffic Control Devices. Included in the draft was identical guidance recommendations that CMS signs not be used for witty traffic safety campaign messages, aligning Wisconsin with the controversial provision in the federal MUTCD.



### Post-Election Audits

In 2021, the U.S. Department of Justice issued guidance on federal statutes regarding voting methods and post-election audits.<sup>22</sup> The guidance document emphasized how certain post-election audit practices by state and local governments could run afoul of the Civil Rights Act or be construed as voter intimidation. This guidance document had clear underlying political motivations, as the Biden DOJ sought to quash various investigations into the 2020 election by Republican state and local actors.

Shortly after, the Wisconsin Elections Commission sent a communication to county and municipal clerks informing them of the DOJ guidance.<sup>23</sup> The WEC communication did not specifically comment on the department's position on the DOJ guidance, but said that clerks with questions about the DOJ guidance could contact the WEC Helpdesk for more information.

### Electronic Voting Systems

In 2015, the U.S. Election Assistance Commission published the Voluntary Voting System Guidelines Version 1.1, a comprehensive guidance document relating to the use of modern technology in election administration.<sup>24</sup>

In 2024, WEC introduced CR 24-067, a rule introducing regulations pertaining to testing and maintaining voting systems.<sup>25</sup> In the rule text, WEC concedes that “commission staff did not perform empirical analysis for this rule as the intent of the rule is simply to implement existing guidance. **The Commission relied on its existing guidance and practices which have been used to certify elections systems in Wisconsin.**”

### Ballot Drop Boxes

In 2020, many states introduced or expanded the use of ballot drop boxes, due to fears of COVID-19 transmission associated with in-person voting. In the years following 2020, federal agencies have provided guidance to states on best practices for ballot drop box operations, including a “Quick Start Guide” by the U.S. Election Assistance Commission and guidance on drop box security by the U.S. Cybersecurity and Infrastructure Security Agency.<sup>26</sup>

Many clerks in Wisconsin used ballot drop boxes in 2020, especially in major cities. Following the 2020 election, the Wisconsin Supreme Court held that state law did not permit the use of ballot drop boxes in *Teigen v. WEC*. However in 2024, the new liberal majority on the Wisconsin Supreme Court revisited the drop box issue in *Priorities USA v. WEC* and overturned the ruling in *Teigen*, permitting the use of ballot drop boxes in Wisconsin once again. On July 11th, 2024, the Wisconsin Elections Commission distributed ballot drop box guidance to clerks throughout the state in light of the *Priorities USA* ruling.<sup>27</sup> The guidance document explains the *Priorities USA* decision by the Wisconsin Supreme Court and provides clerks with answers to frequently asked questions. Included within the FAQ are best practices for operating ballot drop boxes, and WEC recommends EAC and CISA guidance for clerks to review as a starting point for administering ballot drop boxes.

## CONCLUSION

Federal agencies continue to use guidance documents to influence state-level policy while avoiding legislative oversight that would otherwise occur with formal rulemaking. State agencies incorporate these guidance documents into their policymaking, and the federal influence on state agency policy often goes unnoticed by state lawmakers. Bureaucrats see this as a feature and not a bug in their systematic use of federal guidance flow to states, and it is up to state lawmakers to take a more active role in reviewing federal guidance documents flowing to state agencies and for purposes of properly raise objections to federal influence that may not align with political attitudes of the state.

Crafting a mechanism for legislative oversight of federal guidance documents must be done carefully so as not to raise separation of powers issues. In Wisconsin, courts have struck down laws which sought to control how state agencies publish guidance documents, and legislation seeking to control how state agencies interact with federal guidance documents received by the agency could likely suffer the same fate.

However, effective legislative oversight can still be performed through legislative subpoena powers to compel agency officials to appear before legislative committees and produce agency documents; and through creating a reporting requirement for state agencies to periodically produce a report of all federal guidance received by the agency. Upon identifying federal guidance document use that lawmakers do not agree with, legislation could be introduced and passed to update statutory provisions relevant to the agency action, at which point state agencies would have to revise their rules and guidance to align with statutory language.

Not all state agency reliance on federal guidance documents is problematic per se. In fact, policy alignment between state governments and the federal government can be extremely beneficial in certain circumstances. However, it is paramount that lawmakers are aware of federal guidance flow to state agencies and can take action to reject federal guidance when lawmakers deem it necessary.



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## ENDNOTES

- 1 [EPA Legal Tools to Advance Environmental Justice](#)
- 2 <https://dnr.wisconsin.gov/sites/default/files/topic/AirQuality/AMSG/Notes06012023.pdf>
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REFORMING GOVERNMENT

[ReformingGovernment.org](https://ReformingGovernment.org)

PO Box 180291  
Delafield, WI 53018

[info@reforminggovernment.org](mailto:info@reforminggovernment.org)

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