DEVELOPING AN AUDIT TRAIL

March 2008

Quick Start

MANAGEMENT GUIDE

DEVELOPING AN AUDIT TRAIL

The Quick Start Management Guide for Developing an Audit Trail is part of a series of brochures designed to highlight and summarize the information contained in the chapters of the U.S. Election Assistance Commission's (EAC) Election Management Guidelines (EMG). The goal of the EMG is to provide a collection of election management guidelines, consolidated into one document, to assist State and local election officials effectively manage and administer elections. These guidelines are solely designed to serve as a source of information for election officials and not as requirements by which they must abide. The EAC expects the EMG to be completed in 2008. However, due to the urgent need for election management resources, EMG chapters and Quick Starts are released as they are completed.

The content of the EMG and the Quick Start Management Guides has been developed in collaboration with State and local election officials and other election professionals who have first-hand experience managing elections. The EAC is grateful for their participation and ensuring the guidelines are practical and applicable for jurisdictions regardless of their size and resources. The EMG and the Quick Starts are available online at www.eac.gov.

Introduction

- Ensuring elections are administered fairly, accurately, transparently, and efficiently requires creating documentation of each component involved in the development and conduct of an election. These components include all pre-election, Election Day, and post-election activities; examples include, but are not limited to, candidate filing forms, voter registration lists, verification of voting systems, poll workers, etc. Documentation of these processes may also serve to prove the accuracy and validity of an election in a court of law and resolve questions regarding the integrity of the election.

- Furthermore, developing a formal record (audit trail) of an election's components is an essential tool for election administrators to accurately evaluate the strengths and weaknesses of the processes established to conduct an election. It is therefore important to establish accurate methods and procedures for documenting and reviewing an election's audit trail.

Documenting voting precincts, districts, and voter registration data

- Each election is unique and involves specific races and/or questions. The first step in setting up an election is determining which districts and precincts will be included in the election. In many jurisdictions, precincts can be divided by district lines, resulting in what is referred to as "split precincts." It is important to understand the correlation between census tracts, voting precincts, and voting districts. Begin your documentation process for each election by printing and validating the following reports from your voter registration software:

    - Listing of all precincts and districts assigned to each precinct.

    - Listing of any split precincts, if applicable, and districts assigned to each.

These reports will verify that all precincts for an election are associated with the correct district. Tip: *Merging the data in the voter registration software with GIS will allow you to visually verify and confirm that the data is accurate.*

- Understand the design and features of your State's and/or jurisdiction's voter registration software. Confirm that the software has the ability to validate that all residential addresses are assigned to a specific precinct. If possible, consider printing a validation report as a component of your election audit trail.
  TIP: *Flag any addresses that serve as post office box repositories.*

- Confirm that your software has features that will not allow a voter record to be processed unless the user completes the entire transaction.
  EXAMPLE: *A data entry staff member inadvertently skips part of the process required to enter a new voter record. Should that happen, the voter record may appear to be processed, but would not be associated with a precinct which means the voter's name would not appear on the precinct voter list on Election Day.*

Setting Up and Validating an Election

- Prior to every major election cycle, develop a master checklist to use as your guide for documenting and validating the election. Once the checklist has been developed, require staff to follow this checklist and submit the required documentation for final sign-off and approval. This documentation should be filed in the order that it appears on the checklist and stored for auditing purposes.

- A master checklist may include the following documents:

  - Original candidate filing forms and/or questions to be submitted

- Computer printout after data is entered, with dual sign-off indicating that it has been validated to the original documents

- System validation report that verifies the precincts associated with an election are assigned to the correct polling places

- Any other reports that are developed for distribution to the public. These include legal publications, candidate listings, polling place listings, etc. –if these reports are developed by staff working outside of the election setup software (i.e. word processing).

- Ballot styles for proofing purposes

- Any unique State requirements (i.e. candidate rotation report)

- Document confirming that each unique ballot style has been validated against the candidate and district/precinct lists

- Final, approved copy of the ballot deck sent to the printer

- Ballot proofs returned by the printer, proofed to the approved ballot deck sent to the printer

Note: *If the office uses separate, nonintegrated systems to maintain information (i.e. Web site information and separate poll worker and polling place databases) make sure to evaluate and address the potential risks posed by this (i.e. dual data entry of critical data).*

Maintaining the Outgoing and Incoming Audit Trail for Absentee and Early Voting Paper Ballots

- Develop internal reporting procedures to verify that all requests for absentee/early ballots are balanced on a daily basis to the envelopes printed for ballot stuffing. Tip: *Create a daily log sheet for staff to enter the number of applications processed. The same log sheet should keep record of the number of envelopes printed, stuffed, sealed, and delivered to the post office on a daily basis. There should be dual-staff sign off at each step of the process.*

- Establish the same controls for ballots returned by mail. Develop internal procedures to record and verify the number of ballot envelopes returned, number of ballot envelopes challenged, and number of ballot envelopes authorized to be opened. These log sheets become a part of the internal audit trail for absentee/early ballots.

- Confirm that the number of voter records receiving voter history for each day's returned ballot envelopes matches the number of ballot envelopes flagged as receiving voter history. Verify this number by printing reports from your voter software on a daily basis. These reports also become a component of the absentee/early ballots audit trail. Tip: *It may help to use the analogy that an absentee ballot return operation can be similar to working in a bank. For example, each ballot envelope can represent a dollar bill; they must be counted, bundled, and balanced at the end of each day.*

- Examples of an absentee ballot audit trail include:
  - Daily log of returned ballot envelopes
  - Challenged ballot envelope log
  - Rejected ballot envelope log
  - Summary of data entry voter history log
  - Batch number assignment log, if applicable
  - Scanner log, if applicable

Documenting Outgoing Polling Place Supplies and Equipment

- Validate that the supply case for each polling place contains all of the materials required for Election Day. Maintain a checklist for each supply case to ensure all contents have been properly packaged. Require that two staff members confirm the contents and sign off on the checklist. Each of the supply case checklists become a part of the audit trail for the election.

- Identify the Election Day supplies considered to be critical to the conduct of the election and develop a separate checklist and documentation method for these items. Examples include: provisional ballots and envelopes, voter machine activation cards, voter registration list, and voting machine keys. Tip: *Create a policy that requires the staff designated as "Supply Supervisor" to conduct the final audit of these documents and sign off on the checklist; these will become part of the election's audit trail.*

- Identify the polling place supply documents that will be archived as a part of the election audit trail. Examples include:

    - Voting machine opening zero tapes and closing results tapes

    - Opening and closing validation reports (confirming voting machine serial numbers and security seals/tapes)

    - Voter lists with voter signatures

    - Voter receipts or acknowledgement cards

    - Provisional ballot signature list

    - End of day tally sheets

DOCUMENTING THE PREPARATION AND DELIVERY OF VOTING EQUIPMENT

- Develop internal checklists for acceptance testing, diagnostics, and logic/accuracy testing of the voting equipment. Maintain a complete set of checklists for each machine used in each election. Create a centralized filing system to store and archive these documents. Examples to be included in each machine's file folder are:

    - Acceptance testing checklist

    - Logic and accuracy checklist

    - Pre-election checklist (includes information such as protective counter number, protective seal numbers, etc.)

    - Machine tapes and other printed supporting documentation validating logic and accuracy testing

- Use individual polling place delivery sheets to verify the delivery of polling place supplies and equipment prior to Election Day. Require dual person sign off on each delivery sheet – the signature of the delivery person and the signature of the person accepting delivery at each polling place location. These delivery sheets become a part of the audit trail for each election. TIP: *Maintain documentation that all seals are intact and the seal numbers match the numbers recorded prior to delivery.*

Developing a Polling Place Audit Trail

- Educate poll workers, in particular those with supervisory roles, about the importance of separation of duties and the significance of the audit trail created at each polling place on Election Day. Their participation in this process is critical to the success of the audit trail.

- Develop a checklist for performing an audit of each polling place.

- Package supplies so that the first item removed from the supply case is the first step involved in creating the audit trail for the day. Examples of the polling place audit trail include:

  - Opening verification form confirming voting machine serial numbers and protective counter numbers and acknowledging that security seal numbers are intact.

  - Opening zero tapes printed from each voting machine

  - Confirmation of the correct paper ballot styles and quantity

  - Signed poll worker oath of office forms

  - Mid-tally sheets (if applicable, used to balance voters checked in to votes collected throughout the day) TIP: *Train poll workers to think of each voting machine as an individual cash register containing dollar bills (votes). Money (votes) collected throughout the day must balance to the cash register tape (VVPAT).*

  - Closing verification form confirming voting machine serial numbers, end of day protective counter numbers, and closing security seal numbers.

- End of day closing tapes printed from each voting machine

- Confirmation of remaining quantity of paper ballot by style and precinct

- Closing balance form, used to record total number of voters processed – balanced to votes collected in all voting machines and/or paper ballots

- Provide poll workers with an easily identifiable closing package, along with the checklist, for their use in returning the Election Day audit trail documents to the election office. Tip: *Consider establishing an incentive program to reward poll workers who successfully complete the audit paperwork and return all required documents in the polling place closing package.*

- Train Election Day "rovers" to use a checklist for each polling place to ensure that all setup procedures have been followed both outside and inside the polling place. Require that the rover and the supervising poll worker sign off on the checklist for each polling place. This checklist becomes a component of the Election Day audit trail.

Performing a Post-Election Audit

- Recruit and train staff for the purpose of managing and completing the post election audit. Tip: *Partner with other county agencies (i.e. Budget, Audit, or Finance Offices) to borrow staff members to assist your office with this task.*

- Review the checklist developed for performing an audit of each polling place. Begin by gathering all of the closing packages for each polling place; then inventory the contents and review all documentation.

- Assign teams to separate tasks: one team to reconcile voters processed to votes collected; another team to reconcile voting machine opening and closing forms and tapes; and another to balance paper ballots delivered, minus ballots issued, equals unused ballots returned; etc.

- Conduct the audit in an assembly line fashion, with a final validation of all components by the final staff team. Note: *State law may also require additional random audits.*

For information regarding this publication or to request additional copies, please, contact:

The EAC is an independent bipartisan commission created by the Help America Vote Act of 2002 (HAVA). It is charged with administering payments to states and developing guidance to meet HAVA requirements, implementing election administration improvements, adopting voluntary voting system guidelines, accrediting voting system test laboratories and certifying voting equipment and serving as a national clearinghouse and resource of information regarding election administration.