

# Prince William County, Virginia Internal Audit Report: Office of Elections

September 18, 2018





# **TABLE OF CONTENTS**

Fransmittal Letter	1
Executive Summary	2
Background	4
Objectives and Approach	9
Observations Matrix	11
mprovement Opportunity	13
Appendix	14

### TRANSMITTAL LETTER

September 18, 2018

The Board Audit Committee of Prince William County, Virginia 1 County Complex Court Prince William, Virginia 22192 RSM US LLP

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Pursuant to the internal audit plan for calendar year ending ("CY") December 31, 2018, for Prince William County, Virginia ("County" / "PWC"), approved by the Board of County Supervisors ('BOCS"), we hereby present the internal audit of the Office of Elections ("Elections"). We presented the draft report to the Board Audit Committee of Prince William County and BOCS on November 27, 2018, and will be presenting the report to the Board Audit Committee of Prince William County at the next scheduled meeting on February 5, 2019.

Our report is organized into the following sections:

Executive Summary	This provides a high-level overview and summary of the observations noted in our internal audit of the Conference of Elections.	
Background This provides an overview of the Office of Elections, as well as relevant background information.		
Objectives and Approach The objectives of this internal audit are expanded upon in this section, as well as a review of our approach		
Observations Matrix	This section includes a description of the observations noted during our internal audit and recommended actions, as well as Management's response including responsible party, and estimated completion date.	

We would like to thank the staff and all those involved in assisting our firm with this internal audit.

Respectfully Submitted,

RSM US LLP

Internal Auditors



#### **EXECUTIVE SUMMARY**

#### **Background**

The Office of Elections is a PWC general fund supported agency not under the direction of the Board of County Supervisors tasked with serving the voting needs of the citizens of PWC, mandated by Virginia State Code: 24.2-106 through 24.2-122. As of June 1, 2018, there were 278,592 registered voters in the County, representing 60% of the total population. PWC has 91 polling locations (i.e. precincts) spread throughout the County.

Elections is governed by a three (3) person Electoral Board ("Board"), appointed by the Chief Judge of the Judicial Circuit Court to serve three (3) year terms. In accordance with Commonwealth of Virginia law, the Chairman and Secretary of the Board must be members of opposing political parties.

The Board appoints a General Registrar to a four (4) year term of office. The General Registrar's role is to manage the day-to-day operations for the elections, including such things as supervising elections, registering and maintaining up-to-date voter registration records, overseeing the process of absentee voting, and certifying election results. The PWC Office of Elections must adhere to the statute as enacted by the Commonwealth of Virginia General Assembly.

For Fiscal Years (FYs) 2018 and 2019, Elections had an adopted expenditure budget of approximately \$1.7 million and \$1.9 million, including fourteen (14) full-time equivalents ("FTE"), respectively. This amount represents 2.4% and 2.5% of the general government expenditure budget for PWC in FYs 2018 and 2019, respectively.

The mission of the Office of Elections is:

"To provide equal opportunity for all qualified citizens of PWC to register to vote, maintain accurate voter records used in elections, conduct all elections at the highest level of professional standards, ensuring public confidence in the integrity of the results, and be an information resource for citizens regarding voter registration, absentee voting, and elected officials."

Fieldwork was performed June 2018 through August 2018.

### **Objectives and Scope**

The objective of this internal audit was to evaluate the Office of Elections by reviewing, benchmarking and analyzing comparative data of the Office of Elections as compared to other peer jurisdictions, including compliance with applicable State Code and operational policies and procedures. The scope of our work included:

- Gaining an understanding of applicable State Code, and determine the extent to which Elections complies, where applicable;
- Determining if policies and procedures are effective, documented and in place, and evaluating the extent to which Elections complies for areas such as:
  - Electoral process and voting
  - Voting equipment custody exchanges
  - Incident reports
  - Reconciliations of tally tapes
  - Polling maintenance
  - Purchasing /overtime
  - Segregation of duties
  - Data and system security
- Assessing whether records and documentation are sufficient to establish an audit trail associated with key processes, where applicable; and
- Identifying and analyzing key performance indicators and benchmarking against comparable jurisdictions.

The scope of this audit did not include the voter registration process. Additionally, procedures performed as part of this audit did not test the identity of voters who submitted absentee ballots by mail.

#### **Overall Summary / Highlights**

The observations identified during our assessment are detailed within the pages that follow. We have assigned relative risk or value factors to each observation identified. Risk ratings are the evaluation of the severity of the concern and the potential impact on the operations of each item. There are many areas of risk to consider in determining the relative risk rating of an observation, including financial, operational, and/or compliance, as well as public perception or 'brand' risk'.

Summary of Observation Ratings (See page 3 for risk rating definitions)			
	High	Moderate	Low
Internal Audit: Office of Elections	-	1	1



# **EXECUTIVE SUMMARY – CONTINUED**

#### **Observations Summary**

Below is a summary listing of the observations that were identified in the scope of this internal audit. Detailed observations are included in the observations matrix section of the report.

Summary of Observations		
Observations	Rating	
Electronic Pollbooks and Absentee Ballot Data	Moderate	
2. Election Day Fatigue	Low	

Provided below is the observation risk rating definitions for the detailed observations reported in the observations matrix section of the report.

Observation Risk Rating Definitions		
Rating	Explanation	
Low	Observation presents a low risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of low importance to business success/achievement of goals.	
Moderate	Observation presents a moderate risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of moderate importance to business success/achievement of goals. Action should be in the near term.	
High	Observation presents a high risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of high importance to business success/achievement of goals. Action should be taken immediately.	



#### **BACKGROUND**

The Office of Elections is a PWC general fund supported agency not under the direction of the Board of County Supervisors tasked with serving the voting needs of the citizens of PWC, mandated by Virginia State Code: 24.2-106 through 24.2-122. As of June 1, 2018, there were 278,592 registered voters in the County, representing 60% of the total population. PWC has 91 polling locations (i.e. precincts) spread throughout the County.

Elections is governed by a three (3) person Electoral Board ("Board"), appointed by the Chief Judge of the Judicial Circuit Court to serve three (3) year terms. In accordance with Commonwealth of Virginia law, the Chairman and Secretary of the Board must be members of opposing political parties.

The Board appoints a General Registrar to a four (4) year term of office. The General Registrar's role is to manage the day-to-day operations for the elections, including such things as supervising elections, registering and maintaining up-to-date voter registration records, overseeing the process of absentee voting, and certifying election results. The PWC Office of Elections must adhere to the statute as enacted by the Commonwealth of Virginia General Assembly.

For FYs 2018 and 2019, Elections had an adopted expenditure budget of approximately \$1.7 million and \$1.9 million, including fourteen (14) full-time equivalents ("FTE"), respectively. This amount represents 2.4% and 2.5% of the general government expenditure budget for PWC in FYs 2018 and 2019, respectively.

Per discussion with the General Registrar, there have been no outside audits performed in the past three (3) years. We reviewed the Virginia Department of Elections website and found no audit reports relevant to Prince William County.

#### Elections Process Overview

Two to three times each year, the Office of Elections facilitates the election process through which the citizens of PWC exercise their right to vote. The multi-day process is designed to comply with the requirements of the Virginia State Code. The Office of Elections staff perform the preparations for each election and provide primary oversight of the Election Day activities. To support the Office of Elections staff, volunteer Election Officers (also called "poll workers") serve the 91 voting precincts. Approximately 364 temporary employees serve as Officers at each election. For each precinct, a Chief Election Officer ("Chief") and an Assistant Chief Election Officer ("Assistant Chief") are designated. The Chiefs report directly to the General Registrar of the Office of Elections and are responsible for executing the Election Day polling procedures in accordance with Virginia State Code, including the accurate completion of the end of day reconciliations. The Office of Elections staff prepares for each election through the following primary tasks:

- Work with the state approved voting equipment (ballot scanning machines) vendor to change the program code to match the appropriate candidate names;
- Perform logic and accuracy testing of all voting equipment to ascertain that votes are tallying correctly;
- Register new voters, update voter addresses, and purge disqualified voters within the state database (Virginia Election & Registration Information System, VERIS);
- Pack the Election Day cages which contain voting equipment assigned to each precinct and pack the Chief's Election Day bags with supplies; and
- Recruit new Election Officers and host mandatory training sessions for Election Officers.

The Office of Elections staff mails out absentee ballots and opens in person absentee voting centers to host absentee voting for those who applied and met the requirements. In Virginia, voters may vote absentee in two ways: by having a ballot mailed to them or by visiting an absentee vote center to cast their ballot.

Any registered voter may apply for a mail absentee ballot and, if approved, receive their ballot in the mail. Voters may return their marked ballot via the U.S. Postal Service ("USPS") or bring their voted ballot directly to the Office Elections. If voters choose to bring their marked ballot to the Office, these voters are asked to present their Photo ID to verify the return of their ballot.

Currently, the Office of Elections operates three Absentee Vote Centers six weeks prior to every June and every November election. Voters who plan to visit an Absentee Vote Center do not need to submit an application beforehand. These voters visit the most convenient Vote Center with their photo ID and fill out an application in front of Officers of Election. If the application is accepted, the voter is immediately provided a ballot. Once the voter marks their ballot, the voter inserts their own ballot into the voting equipment, similar to how they would vote in their precinct on Election Day.



#### Elections Process Overview – Continued

The Central Absentee Precinct ("CAP") operates as the 92<sup>nd</sup> precinct on Election Day. On Election Day, Central Absentee Officers of Election process both mail ballots and absentee vote ballots. After 7:00 p.m. on Election Day, all absentee ballots are counted and tallied. These Central Absentee results are also reviewed the next morning at Ascertainment, by a team separate from the Election Day CAP Officers.

On the day before the Election, third party moving service trucks pick up the locked equipment cages and deliver them to each precinct and the Chiefs pick up their supply bag containing half of the printed ballots for his/her precinct. At each precinct, polls open at 6:00 a.m. on Election Day and remain open through 7:00 p.m. "Zero tapes" are run prior to opening the polls to evidence that no ballots have already been cast. Two to three Election Officers check-in voters on laptops running the state approved "Advocate" electronic pollbook software. One Election Officer oversees the placement of ballots by voters into the voting scanner. The respective Chief provides oversight throughout the day and takes ownership of the end-of-day reconciliation procedures.

Ascertainment takes place the morning following Election Day. A select group of experienced Chiefs performs the ascertainment process, with individuals from both political parties involved in the certification of each precinct's results. Any paperwork discrepancies are reviewed and resolved real-time with the Office of Elections staff and the Electoral Board. A County Sheriff's Deputy delivers the certified election results to the Clerk of Circuit Court, and the Office of Elections staff then publishes the official results to VERIS.

#### **Comparisons Overview**

Organizations of all types and sizes recognize the value of comparing themselves to other like organizations. This process of benchmarking yields valuable information to leaders and decision makers. Identifying comparable peer groups can be extremely challenging, as no two organizations are exactly alike. There are, however, risks inherent in the benchmarking process. Organizations could account for data differently; thus, there are limitations to the comparisons. To address this potential limitation, we sourced our data from 'published data' from respective organization's budget books, census data, and web sites.

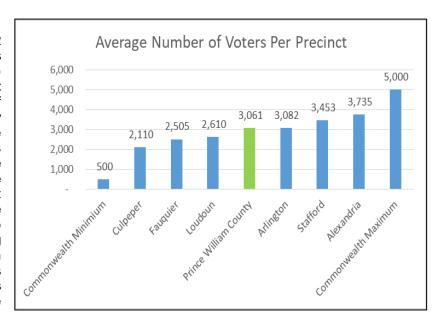
Based on discussion with the Office of Elections, the following peer jurisdictions were selected for benchmarking. These were identified as having similar economic environments and a shared proximity to the Washington, D.C. metro area:

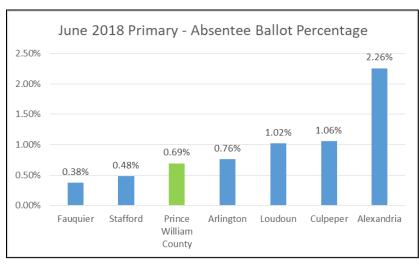
- Arlington County ("Arlington")
- City of Alexandria ("Alexandria")
- Loudoun County ("Loudoun")
- Fauquier County ("Fauquier")
- Culpeper County ("Culpeper")
- Stafford County ("Stafford")



#### Comparisons Overview - Continued

Prince William County has a population of approximately 460,000 citizens as of June 30, 2018, according to the County's website. As of June 1, 2018, there were 278,592 registered voters in the County, according to the Virginia Department of Elections. This represents 60% of the total population. PWC has 91 polling locations (i.e. precincts) spread throughout the County. State Code § 24.2-307 outlines that a precinct should not serve fewer than 500 registered voters and not more than 5,000 registered voters as of the time at which the precinct is established. Additionally, the precincts are determined by the state legislation using a formula, which considers the requirements across the magisterial, house, senate, and congressional district divisions. This process, which was last performed in 2011, occurs once every ten years using updated census data. The resulting precinct determinations are pushed down to the County Office of Elections. The local governing body may split precincts to add additional polling locations, but may not eliminate precincts or reallocate voters across other existing precincts as outlined in State Code § 24.2-304.1. The Office of Elections recommends adding more precincts prior to the 2020 presidential election in an effort to avoid the long lines voters experienced during the 2012 election. To execute this strategy, The Office of Elections intends to split the ten (10) precincts currently having the highest number of voters. Each of the top ten precincts serves between 3,977 and 4,684 active registered voters. As demonstrated below, PWC's average number of voters per precinct is currently in the middle of the respective jurisdictions, as well as above the statutory minimum but below the maximum.





In an effort to reduce wait time and lines at polling locations, absentee voting is encouraged. Elections encourages this through electronic advertising boards and magazine advertisements.

Any registered voter may apply for a mail absentee ballot and, if approved, receive their ballot in the mail. Voters may return their marked ballot via USPS or bring their voted ballot directly to the Office of Elections. If voters choose to bring their marked ballot to Elections, these voters are asked to present their Photo ID to verify the return of their ballot.

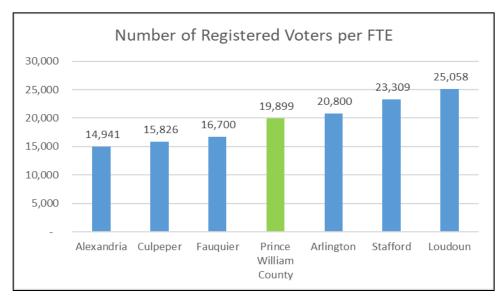
Currently, the Office of Elections operates three Absentee Vote Centers six weeks prior to every June and every November election. Voters who plan to visit an Absentee Vote Center do not need to submit an application beforehand. These voters visit the most convenient Vote Center with their Photo ID and fill out an application in front of Officers of Election. If the application is accepted, the voter is immediately provided with a ballot. Once the voter marks their ballot, the voter inserts their own ballot into the voting equipment, similar to how they would vote in their precinct on Election Day.

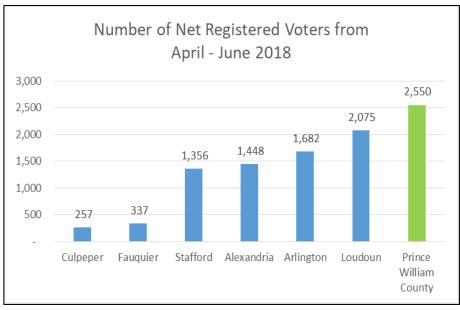
The chart above presents a breakdown of the percentage of voters who voted absentee for the June 2018 primary election. PWC had the third lowest percentage of ballots cast by absentee as compared to the other peer jurisdictions.



#### Comparisons - Continued

Elections employs staffing resources, including full-time equivalents and temporary employees, to prepare for and hold each election. Annually, there are two to three elections conducted in PWC. In addition to running the elections, the Office of Elections staff registers new voters, reviews and approves absentee ballot applications and provides education to registered voters. Elections also maintain voter information, such as current addresses. The graph at the right compares the ratio of registered voters to FTEs across the sampled jurisdictions. PWC ranks average in comparison.

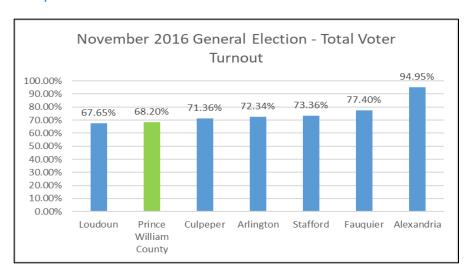




PWC has seen a marked increase in new registered voters over the preceding three months before June 2018. A primary reason for this is attributed to the rise in residential growth in PWC. PWC has had a fifteen (15) percent population growth according to U.S. Census data over the last ten (10) years. The chart to the left shows net registered voters (new registered voters entering county less registered voters leaving county) across the comparable jurisdictions. PWC has the highest amount of net registered voters for the three (3) month period.

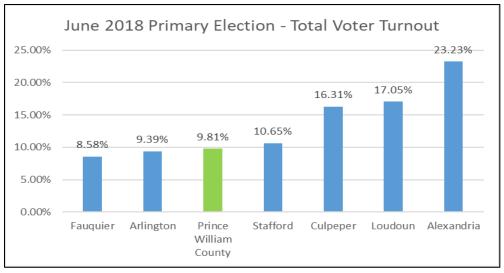


#### Comparisons - Continued



The graph to the left shows the total voter turnout for the November 2016 General Election. As demonstrated, PWC had the second lowest turnout at 68.2%.

The graph to the right shows total voter turnout for the June 2018 Primary Election. As shown, PWC has the third lowest turnout at 9.81%, ahead of Fauquier and Arlington.





#### **OBJECTIVES AND APPROACH**

#### **Objectives**

The objective of this internal audit was to evaluate the Office of Elections by reviewing, benchmarking and analyzing pertinent data of Elections as compared to other peer jurisdictions, including compliance with applicable State Code and operational policies and procedures. The scope of our work included the following:

- Gaining an understanding of applicable State Code, and determine the extent to which Elections complies, where applicable;
- Determining if policies and procedures are effective, documented and in place, and evaluate the extent to which Elections complies for areas such as:
  - Electoral process and voting
  - Voting equipment custody exchanges
  - o Incident reports
  - o Reconciliations of tally tapes
  - o Polling maintenance
  - Purchasing /overtime
  - Segregation of duties
  - Data and system security
- Assessing whether records and documentation are sufficient to establish an audit trail associated with key processes, where applicable; and
- Identifying and analyzing key performance indicators and benchmarking against comparable jurisdictions.

#### **Approach**

Our audit approach consisted of the following three phases:

#### <u>Understanding of the Process</u>

The first phase of this audit consisted primarily of inquiry and observation, in an effort to obtain an understanding of the key personnel, risks, processes, and controls relevant to the objectives outlined above. The following procedures were completed as a part of this phase:

- Met with the appropriate Elections personnel to discuss the scope and objectives of the project, obtain preliminary data, and establish working arrangements;
- Physically observed the June 2018 primary election, obtained and reviewed detailed supporting documentation and documented the process;
- Researched key performance indicators and obtained applicable statistics, voting results, and other documents deemed necessary; and
- Reviewed the applicable State Code and policies.

#### Benchmarking and Detailed Testing

The purpose of this phase was to test compliance and internal controls based on our understanding of the processes obtained during the first phase, including the identification and assessment of relevant trends. We utilized sampling and other auditing techniques to meet our audit objectives outlined above. We conducted the following, and other procedures as deemed necessary:

- Assessed compliance with statute over key areas of the election preparation and execution process.
- Assessed controls over Logic & Accuracy ("L&A") testing, the process by which voting equipment is configured, tested, and certified for accuracy prior to an election.
- Reviewed end-of day reconciliations by agreeing the checked-in voter count to the total number of votes cast per the scanning machine tape. Where variances were noted, it was checked that an explanation was provided at *Part F* of the *Statement of Results*. The Election Day results recorded by the PWC Office of Elections was tied to the Virginia Department of Elections database.
- Reviewed absentee voting reconciliations by agreeing the number of ballots cast per the precinct Officer's manually tracked record, the voting machine tally tape from close of absentee voting, and the ballot count performed at the Main Office on Election Day.
- Assessed public opinion by reviewing voter complaints.



#### **OBJECTIVES AND APPROACH – CONTINUED**

### Approach - Continued

#### Benchmarking and Detailed Testing - continued

- Assessed reasonableness of Office of Elections expenditures by inspecting the supporting invoices for business need, nature of purchase, and approval.
- Assessed controls over candidate names/nicknames listed on ballots by comparing back to the Virginia Department of Elections' public candidate listing.
- Assessed process over canceling of disqualified voters.
- Analyzed comparative jurisdictional data; including:
  - Average number of voters per precinct;
  - Percentage of absentee ballots cast;
  - Number of registered voters per Office of Elections FTE;
  - Net registered voters for the adjoining jurisdictions; and
  - o Total voter turnout for November 2016 General Election and June 2018 Primary Elections.

#### Reporting

At the conclusion of this internal audit, we summarized our findings and observations into a written report. We have reviewed the results with the Office of Elections and appropriate Management personnel, and have incorporated Management's response into this report.



# **OBSERVATIONS MATRIX**

Observation	1. Electronic Pollbooks and Absentee Ballot Data
Moderate	Subsequent to the opening of the polls on Election Day, Office of Elections staff identified that the electronic pollbooks were not updated with the complete listing of absentee voters. This was caused by an Office of Elections error, the absentee voter data retrieved from the state database (Virginia Election & Registration Information System, VERIS) was not completely uploaded to the electronic pollbook. As a result, mail-in or in-person absentee voters could have been checked in at a polling location and provided a duplicate ballot to cast on Election Day. In response to this issue, the Chief at each precinct was instructed to use the printed listing of voters mailed an absentee ballot and manually update the electronic pollbook to flag these voters. This printed listing was on-hand at each precinct location, as provided to each Chief on the day prior to Election Day. Additionally, all precinct Chiefs were instructed to compare the printed listing of voters mailed an absentee ballot to the listing of Election Day voters who were electronically checked in prior to the identification of this issue. No duplicate voters were identified.  To corroborate that no duplicative votes were cast, RSM compared the listing of voters to whom absentee ballots were mailed to the
	electronic pollbook record of in person voters who cast a ballot on Election Day. No duplicative casting of votes was identified.
Recommendation	Election Day procedures should be enhanced to include a process whereby Chiefs validate that electronic pollbooks have been updated to systemically identify voters mailed absentee ballots. This process should include a sample of voters from each party relevant to the current election, and should be performed prior to the opening of the polls on Election Day.
<b>Management's</b> Action Plan  Response: In Virginia, a dual primary is the equivalent of two simultaneous elections each with its own database there is no party affiliation at the time of voter registration. In the June, 2018 Dual Primary, the database was not absence of Absentee voters being marked on the electronic pollbooks was noticed and communicated by precinc the Office of Elections staff. Because of the dual primary pollbook issue, the Office of Elections modified Pre-El to include validation of pollbooks by a second staff member two days prior to Election Day. Additionally, prior to Election Day, the Chief or Assistant Chief confirms that pollbooks have been updated to identify voters who have Responsible Party: Elections Director/General Registrar	
	Estimated Completion Date: The Electronic Pollbook and Absentee Ballot Data procedures update was discussed at the July 24, 2018, Electoral Board meeting and communicated to the Office of Elections Staff the following week. The new procedure for updating electronic pollbooks is in effect for the November 6, 2018, Election and will be used in all elections going forward.



# **OBSERVATIONS MATRIX - CONTINUED**

Observation	2. Election Day Fatigue
Low	The day after an election, the Office of Elections staff, select experienced precinct Chiefs, and the Electoral Board members gather at the Main Office to complete the ascertainment process. Ascertainment entails going through all of the paperwork from each precinct to ensure that the information is complete and accurate in accordance with State Code § 24.2-671. We observed that all three (3) Electoral Board members were present to oversee the process and certified the results. Precinct Chiefs do not complete the ascertainment on their own precinct for facilitation of proper segregation of duties. Five (5) tables were set up for the ascertainment, with four (4) precinct Chiefs assigned to each table. Two (2) members of each party were at each table.
	Each table was assigned one (1) precinct at a time and was provided with all of the sealed election day envelopes for that precinct. The Chiefs completed an "ascertainment checklist" for each precinct to assess that all of the forms were complete and accurate, all signatures were present, and all information was in the proper envelopes. Whenever a potential error was found, the table would raise their hand and request assistance from Elections staff. Any issues identified were noted on the back of the "ascertainment checklist", with an indication of the corrective action taken by the participating precinct Chiefs. If an issue cannot be addressed by the precinct Chiefs, the Officers working the precinct on Election Day are contacted. This was not required for the June 2018 election; all findings were addressed and cleared during the ascertainment process.
	The errors identified through the ascertainment process could indicate a pervasive issue with the Election Officers' ability to maintain attention to detail through the end of a 15-hour day. Types of errors identified included:  • Missing signatures  • Number of votes/data inputs in the wrong location  • Digits are recorded in reverse positions or transposed (i.e. 18 is recorded rather than 81)  • Flash drives with pollbooks not returned in proper envelope
	These errors were corrected at the table during the ascertainment process and, in this case, were ultimately non-consequential. However, the pervasive presence of these types of errors indicates an increased risk that election documentation may be incomplete or inaccurate.
Recommendation	The Office of Elections should consider the employment of additional Election Officers to serve on Election Day. A split-shift option, allowing some volunteers to work 7-hour shifts as opposed to 15 or more hours, may be one alternative. Another option could be to have one additional Election Officer per precinct, who comes to the precinct one hour prior to closing of the polls to provide oversight of the end of day reconciliations and documentation.
Management's Action Plan	<b>Response:</b> The Office of Elections will perform an analysis, beginning after the November 6, 2018, Election and Ascertainment, to identify the type and number of paperwork errors processed during Ascertainment on November 7, 2018. The November 2018 Ascertainment errors will be reviewed, along with RSM findings from June 2018, to determine and rank areas of potential weakness. Based on the results of the analysis, the Office of Elections and the Electoral Board will consider adding a specialized Election Officer at each precinct to assist with closing of the polls and provide oversight of the end of day reconciliations and documentation.
	Responsible Party: Elections Director/General Registrar
	Estimated Completion Date: May, 2019



#### IMPROVEMENT OPPORTUNITY

#### **Ballot on Demand**

The Office of Elections' Ballot On Demand ("BOD") process allows Elections to significantly reduce the number of pre-printed ballots required for each election. Under this process, the ballot is printed at the polling location real-time after the voter selects which party's contest they chose to vote in. The Advocate Electronic Pollbook software identifies the voter's district and prints the party ballot with the candidates relevant to that district.

For the June 2018 election, 20 out of 91 precincts piloted use of Ballot On Demand. Shifting all precincts to Ballot On Demand for non-presidential elections would save costs by printing only those ballots that are required for the actual turnout. Based on our review of the analysis performed by the Office of Elections, we estimate annual cost savings of approximately \$40,000.

Additionally, Ballot On Demand would reduce the risk that an Election Officer accidently provides the voter with a ballot for the wrong district. Fewer ballots further reduces the risk that ballots are inappropriately obtained and used for fraudulent voting attempts.



#### **APPENDIX**

#### Virginia State Code

Virginia State Code: 24.2-106 through 24.2-122 mandates the Office of Elections. We tested the Office of Elections' compliance, by utilizing sampling and other auditing techniques, noting no exceptions. The below is a summary of the applicable sections of the State Code that were assessed for compliance.

State Code	State Code Overview	Procedures Performed by Elections
§ 24.2-115.2	Election Officer training	In-person training sessions and open labs are offered at multiple times prior to election week; on-line trainings are an option for experienced Officers. Training attendance is tracked and is required to serve on Election Day.
§ 24.2-120	Oath of office	Officers were sworn in prior to opening of the polls on Election Day.
§ 24.2-307	Number of voters per precinct - not fewer than 500 registered voters and not more than 5,000 registered voters at the time at which the precinct is established	Elections tracks and monitors the number of registered voters per precinct using data reported by the Virginia Department of Elections. All precincts are in compliance. Elections plans for additional precincts as the count approaches 4,500.
§ 24.2-427	Cancellation of registration by voter or for persons known to be deceased or disqualified to vote	Using data from the Commonwealth of Virginia, Elections cancels the registration of all deceased and disqualified voters. All such individuals are notified through mail.
§ 24.2-609	Voting booths	All precincts have voting booths with privacy shields or sides.
§ 24.2-610	Materials at polling places	Prior to opening the polls at 6:00 a.m. on Election Day, each precinct checked the contents of the cage and radioed Elections to verify the pollbooks, ballots, voting equipment keys, and other supplies required to conduct the election were delivered to the polling location.
§ 24.2-621	Delivery of ballot packages to officers; opening packages	When the precinct Chiefs obtained their supplies on the Sunday prior to the election, the General Registrar removed the packaged ballots from the bag and the respective Chief certified that the correct amount and proper district ballots were delivered. The receipt of the remaining ballots in the cage was confirmed by the precinct Chief prior to the opening of the polls on Election Day.
§ 24.2-626	Governing bodies shall acquire electronic voting and counting machines	Elections certified that the Electoral Board governs purchases of voting machines. The voting machine vendor, Hart, is approved per the Virginia Department of Elections.
§ 24.2-633	Notice of final testing of voting system; sealing equipment	Voting machines were tested for logic and accuracy prior to Election Day. The keys to voting machines were subsequently sealed.



## **APPENDIX - CONTINUED**

## State Code - Continued

State Code	State Code Overview	Procedures Performed By Election
§ 24.2-634	Locking and securing after preparation	Election equipment is kept in locked cages, one (1) cage per precinct. All of the precinct cages were locked in an enclosure, accessible only by Elections staff.
§ 24.2-653	Voter whose name does not appear on pollbook or who is marked as having voted	Such voters were able to submit a provisional ballot. Provisional ballots were not scanned by the voting machines on Election Day. Provisional ballots were reviewed by the Electoral Board during the ascertainment process the day after the Election.
§ 24.2-667	Completion of Statement of Results	The Statement of Results, signed by all respective Officers, and the tally tapes were submitted to Elections in a sealed envelope at the close of Election Day.
§ 24.2-671	Electoral board to meet and ascertain results	On the day after the election, the Office of Elections staff, the Electoral Board, and select precinct Chiefs performed the ascertainment process to validate the results submitted by each precinct. The process was overseen and certified by the Electoral Board.
§ 24.2-675	Abstracts of votes to be made by secretary and forwarded to State Board and to clerks	Immediately after the ascertainment process, election results were physically transported to the Clerk of Court following the documented chain of custody.
§ 24.2-712	Central absentee voter precincts; counting ballots	Elections has a central absentee ballot precinct responsible for the processing and tallying of all absentee ballots. Additionally, at the Office of Elections headquarters, a hand-count of absentee ballots was performed beginning at 3:00 p.m. on Election Day.

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