Review of the Elections & Registration Absentee Voting Process

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*Final Report Only.

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Engagement Scope

➢ **Objective:** To assist Elections' management in assessing the effectiveness and efficiency of the absentee voting process and evaluate whether adequate controls exist throughout the process.

➢ **Scope:** Absentee voting transactions between January and March 2023, to include onsite observations of the absentee voting process during the upcoming Mableton City Elections.

Background

➤ **Purpose of Request:** Due to two issues encountered during the November 2022 general election related to the Absentee By Mail process, the Board of Elections (BOE) and Elections Management requested Internal Audit to perform a consulting review of the Elections & Registration Absentee Voting Process.

Background, continued...
Timeline

January 2023

➢ Introductory meeting (12/30/2022)

➢ Consulting Agreement Executed (1/24/2023)

February – April 2023

➢ Procedures, Documents, and Reports Retrieval

January – March 2023

➢ Onsite visits (various)

April 2023

➢ Election Management Presentation of Draft Report (4/11/2023)

➢ Issue Final Report (4/17/2023)

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Background, continued...

City of Mableton March 2023
Absentee Application & Ballot Statistics

- Total Applications Received: 226
- Total Applications Rejected: 40 *[Based on missing information]*
- Total Applications Unprocessed: 1 *[Voter called & requested ballot to be cancelled]*
- Total Duplicate Ballots: 10
- Total Ballots Mailed/Issued: 175
- Total Ballots Received/Counted: 136*

*Note: 3 Provisional ABM ballots issued, but not cured/counted.

Overall Impact on Governance

Overall Impact on Governance

The recommendations, when implemented, will strengthen the overall internal control environment over the absentee voting process. This will also provide the Board of Elections, Elections management, County leadership, and other stakeholders with greater confidence that absentee applications and ballots are:

- ➢ properly accounted for;
- ➢ complete and accurate;
- ➢ processed timely and efficiently; and
- ➢ accurately reported in compliance with the State and County laws, rules, regulations, and expectations.

Other risks that are addressed with the recommendations and corrective actions:

- ➢ Efficient use of resources;
- ➢ Reliability of information and reporting;
- ➢ Restricted access to voter information;
- ➢ Equitable distribution of workloads;
- ➢ Segregation of duties;
- ➢ Timely identification of duplicate, missing, and/or incomplete applications or ballots;
- ➢ Timely identification of ballots not processed/mailed or processed/mailed in error;
- ➢ Physical and operational safeguards; and
- ➢ Long-term sustainability and business continuity.

Review of the Elections & Registration Absentee Voting Process

Absentee Voting Growth Opportunities

Absentee Application Acceptance Process

Pathways

- Email (Sandbox)
- Portal
- Walk-Ins
- Mail
- Fax

Verification Process

- Pre-Sort
- Highlight & Lookup (H/L)
- Accept & Issue (A/I)

Review of the Elections & Registration Absentee Voting Process

Pathways

Email (Sandbox)

Description:

Absentee ballot applications are accepted via email using the absentee@cobbcounty.org email address.
[Note: This email is maintained outside of the County's network as a security safeguard via three (3) computers.]

Observations:

➢ Access to the absentee email account had not been configured based on business need, current staffing, and to ensure that proper segregation of duties exist.

➢ Evidence to substantiate the completion of tasks was not readily available.

➢ Additional tracking and monitoring functionality is needed for the absentee email pathway. The current process does not provide for an efficient way to delineate the emails process with a tolerable degree of accuracy and on a consistent basis. As such, no information is readily available to identify which personnel handled the respective absentee application email.

Email (Sandbox), continued...

Recommendations:

➢ Access to the absentee email account should be restricted to individuals based on business need and specific job responsibilities or functions related to the email pathway. Access should be periodically reviewed with each election, at a minimum, and/or with changes in personnel. Access should also be evaluated to ensure that proper segregation of duties and monitoring activities exist.

➢ Evidence to substantiate the completion of the required tasks should be documented and maintained for review to ensure that the absentee applications received via the email pathway are processed as expected.

➢ Coordinate with the Information Services (IS) Department to evaluate the current reporting, system functionality, and configuration needs of the absentee email pathway. Any revised configuration should result in an efficient way to separate absentee email applications, identify the assigned personnel, a categorization function to distinguish absentee email applications from non-absentee emails, a function to prevent the deletion of emails in Outlook, an audit trail to prevent changes or modifications within the email pathway, and provide the reports needed for periodic reconciliation and validation.

Portal

Description:

Absentee ballot applications are completed and accepted via the Secretary of State (SOS) Online Voter Registration portal. Team members access the applications submitted via the portal by logging into GARViS, Georgia Registered Voter Information System.

Observation:

➢ GARViS has the ability to run reports and is not currently utilized to the fullest extent. For instance, a report should be generated to provide a summary of the applications for comparison to the printed applications and attachments to ensure all applications for validation and completeness.

Recommendation:

➢ Implement procedures to ensure submitted applications have been reviewed and validated by utilizing the reports available in GARViS.

Walk-In

Description:

Absentee ballot applications are accepted by Election staff at the walk-up windows at the Cobb County Board of Elections facility.

Observation:

➢ At the time of our visit there were no walk-ins to observe; however, based on our discussions, the walk-in windows serve as a drop-off area for applications. Applications are date/time stamped and logged. The number of applications for the day are not tabulated by the team member receiving the applications and are not validated by the team member retrieving them.

Recommendation:

➢ Update the walk-in log to include the number of applications received so that when the applications are retrieved by Pre-Sort team members, the amount that should be in the bundle is known. The Pre-Sort team member should validate the count and both teams should acknowledge with initials and date. Procedures have been updated to perform a count and have a team member sign off.

Mail

Description:

Mail is picked up from the reception area once daily. The envelopes are opened, applications removed, date/time stamped on each page, stamped "received by mail", and the envelopes are maintained.

Observation:

➤ At the time of our visit there were no mailed applications to observe. Absentee applications received via mail should be tracked at the pathway level (by count) prior to transfer to the 'Pre-Sort' team. Mail is currently received by the front desk personnel and transferred to the Pre-Sort team for opening and processing with transfer validation.

Recommendation:

➤ The designated front desk personnel (and backup, when applicable) should log the number of absentee applications received via mail each day prior to transferring to the 'Pre-Sort' team. A transfer of responsibility with dual validation should also be included and included on a log as referenced in the written procedures.

➤ The current procedures indicate that one or more people may open the envelopes, but requiring a two-person team should be considered when opening envelopes.

Fax

Description:
Applications are retrieved from the fax machine at designated times, date/time stamped, stamped "Received by FAX", logged on the "Daily FAX log of applications", and then placed in the Pre-Sort area. Unprocessed faxes are placed in the yellow bin labeled "Unprocessed Fax".

Observation:
- At the time of our visit there were no faxes to observe; however, the fax log and reporting tool is a manual process and applications can be removed from the fax area without validation. An automated report of faxes received can be utilized for validation and completeness.

Recommendation:
- Implement use of the automated report from the fax machine and review the report manually on a periodic basis (i.e. daily) to ensure completeness in processing the faxed applications.

VERIFICATION:
Pre-Sort

Verification – Pre-Sort

Description:

During the Pre-Sort process, team members perform the initial review of the absentee applications received from the five pathways to ensure the application contains all the required information. Following the review, applications are placed in one of three bins located in a hallway:

1. Applications containing all the required information are placed in the Highlight & Lookup (H&L) bin.

2. Applications needing further review are placed in the "Further Review" bin.

3. Applications missing one or more of the required information is put in the "Rejected application" bin.

Verification – Pre-Sort, continued...

Observation:

➢ Absentee by mail applications are kept in the hallway (Pre-Sort area) while going through the review process where they can be accessed by all staff in the area. Voter information may be accessed by unauthorized personnel or team members outside the ABM process and applications maybe misplaced or lost.

➢ Of the five pathways, four record the receipt of the applications on a log; however, the logs are not tallied and validated as the applications are processed throughout the day, and/or at the end of the day.

Recommendation:

➢ Absentee by mail applications should be stored in a location only accessible by authorized personnel or those with a business need or another compensating control implemented.

➢ Team members should tally the number of applications at least daily and initial and date the count, then the totals should be verified by another team member/lead to ensure an accurate count of applications at the close of each day.

Highlight & Lookup

Verification – Highlight & Lookup

Description:

The Pre-Sort team is tasked with reviewing each application for the required voter information; highlighting the required information; verifying the voter's information within the GARViS voter registration system; validating the application is complete; and matching voter information on voter registration.

Observation:

➢ If any required information is missing on any one application, except for the election date, the entire batch is returned to the Pre-Sort team, potentially delaying the processing of complete applications. This process also does not include transfers of responsibility via tracking.

Recommendation:

➢ Revise the process where only the application with missing information is returned to the Pre-Sort team. Batch identification and tracking method should be implemented to indicate how both the returned and complete applications within the batches are tracked until completed.

Accept & Issue

Verification – Accept & Issue

Description:

Applications that were validated through the Highlight & Lookup (H/L) process go through a process to prepare the application for ballot issuance. This process includes reviewing the application status and ensuring that the voter information has been verified.
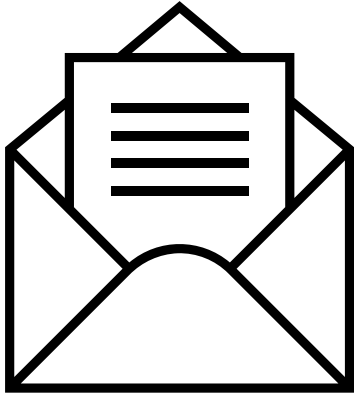
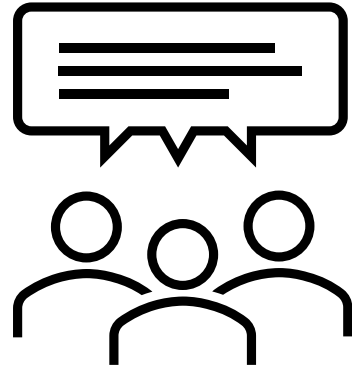**_Observation:_**

➢ See observation under Highlight & Lookup (H/L).

Recommendation:

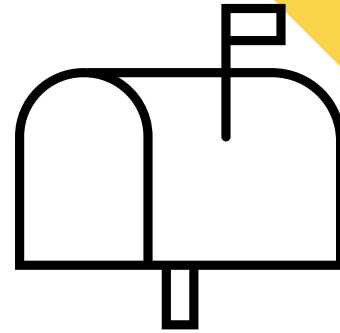➢ See recommendation under Highlight & Lookup (H/L).

Ballot Production Phase

Ballot Packing

Review

Mail Ready

Scanning (OnBase)

Review of the Elections & Registration Absentee Voting Process

Ballot Packing

Ballot Production- Ballot Packing

Description:

The list of applications that were validated and accepted is obtained from the election management system (GARViS), and reviewed for completeness and accuracy. Ballots are printed for all applications that were properly validated.

Observations:

➢ This is a complex process with many steps performed in preparing the data to produce a printed ballot and packing. Although written procedures were provided, additional data manipulations were needed in preparation for printing and packing during the City of Mableton ballots. As such, the written procedures should be updated to include the additional manipulations identified and any other potential compensating controls needed.

➢ The written procedures do not address how the flash drive is managed to ensure there is no duplication of printed ballots or that access to voter data is protected.

➢ Packed ballots were left over the weekend in an open area, but subsequently validated during the review process.

Review

Ballot Production – Review

Description:

The post packing review process is to ensure the information printed on the ballots is accurate and complete and to ensure each ballot is mailed and cross-referenced to an existing application.

Observations:

➢ During our observation of the post packing review, we noted incorrect information from the GARViS system and/or internally generated reports (i.e., did not pull suffixes; permanent mailing address instead of temporary; and voters designated as disabled in error) and applications had missing or incorrect information (i.e., missing elderly designation; incorrect mail date; missing pathway stamp; transposed numbers, etc.).

➢ The written procedures were provided after our observation; however, as part of the post packing review, the written procedures did not include the tabulation and reconciliation process of the ballots and applications to the list. During our observation, the team members ensured that the count of applications on the internally generated reports was consistent with the number of ballots.

Mail Ready

Ballot Production – Mail Ready

Description:

Mail ready is the final step in the post packing review process. All verified applications and ballots that do not require further action are now ready to be mailed.

Observations:

➢ During our observation of the post packing review, the ballots that were validated were placed into a locked cage until the mail courier pickup. There is no transfer documentation included with the ballots to verify the number of ballots the mail courier should be retrieving or to confirm the number of ballots actually received.

Ballot Production – Scanning

Description:

Applications are scanned into OnBase for record retention purposes.

Observation:

➢ This process was not observed for the City of Mableton election, as it had not occurred.

Ballot Production Recommendations

Ballot Production, continued...

Recommendations:

➢ Update the written procedures to include additional data manipulations or other compensating controls needed to prepare ballots for printing and packing.

➢ Expand the written procedures to include the required access controls for the data maintained on the jump drive. Updates should reflect the process to overwrite or remove existing data prior to re-use.

➢ Team members should continue to compare and validate the number of ballots produced to the number of ballots to be mailed utilizing all available resources. Reconciliations should also ensure that discrepancies are identified in a timely manner, researched, and corrected.

➢ Prior to the ballots being placed in the locked cage, a coversheet or slip should be included with each batch to indicate the number of ballots in a batch that has been counted by a team member and verified by another. The mail courier or another team member at the time of pickup should once again count and verify the number of ballots being received, then initial and date.

Ballot Processing*
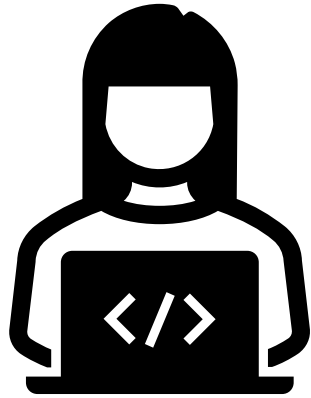
Acceptance

Opening & Extraction

Ballot Tabulation

Duplication and Adjudication

* Note: This stage of the process was primarily reviewed via procedures and/or from discussions with the Elections staff versus actual Auditor observation. In some instances, the Auditor observed that the process was occurring from the logic and accuracy testing area. However, actual tasks performed could not be observed in detail.

Ballot Acceptance

Ballot Processing – Ballot Acceptance

Description:

There are four pathways for returning ballots to the office.

1. USPS/Global Shipping Carrier

2. Walk-Ins (Hand Delivery) – Main Office

3. Walk–Ins (Hand Delivery) – Advance Voting Satellite Site(s)

4. Dropbox

Returned ballots are counted and logged by pathway in the Pre-Sort ballot process, then sorted by pathway, location, and precinct in the Sorting process, verified in GARViS in the verification process and then accepted in GARViS in the acceptance process. Ballots are secured in a locked cage at each of these stages.

Observations:

➢ Although not observed, the current procedures indicate several instances of transfers between secured cages and bins within cages; however, limited transfer of responsibility controls are captured within the procedures to ensure that all ballots are tracked as transferred from one state (bin or cage) to the next.

Ballot Opening & Extraction

Ballot Processing – Ballot Opening & Extraction

Description:

Per written procedures and limited observation by the IA team from the Logic and Accuracy location, a three-member team of Elections and Registrations staff perform the ballot opening and extraction duties while two representatives from political parties observe the process. Returned ballots are grouped by precinct and a reconciliation sheet documenting the date, precinct, total ballot count, and verification by signature is attached. The three-member team counts the ballots, while in the envelope, extracts the ballots, and the official ballot envelope is separated. The team lead verifies the ballot count, including any damaged ballots, and ensures that the number of ballots documented on cover sheet agrees to reconciliation sheet by precinct.

Observations:

➢ None.

Ballot Tabulation

Ballot Processing – Ballot Tabulation

Description:
The hand counted ballots and reconciliation sheet is provided to a two-person team who scan the ballots and readout the count to the team lead and record the number of valid ballots, number of ballots with issues (ambiguous mark, misread, overvote, spoiled, and write-in), date/time, and batch number. Any note is added and signed by two staff who performed the scanning and a team lead who observed.

Observations:
➢ No written procedures were identified for this process at the time of our draft discussion and only limited observation by the Internal Audit team from the Logic and Accuracy location.

Ballot Duplication & Adjudication

Ballot Processing- Ballot Duplication & Adjudication

Description:

Duplication of a ballot is performed when a ballot is physically damaged, and a new ballot is created and scanned in order to process the vote.

Observations:

➤ We observed the duplication process from the Logic and Accuracy testing area. We were unable to view the detailed information and what was marked on the new ballot; however, we witnessed the review panel team (2) perform separate tasks, and then exchange tasks with the oversight by an Elections team member.

Ballot Storage

Ballot Processing – Ballot Storage

Description:
Scanned ballots are packaged, labeled, and stored securely until transfer to the Clerk of Court evidence boxes.
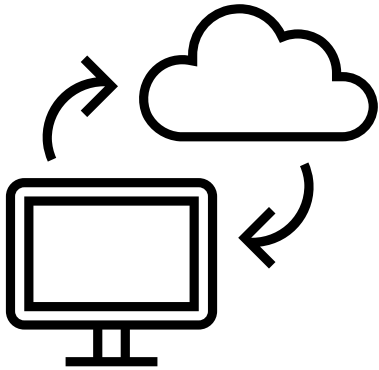
Observations:
➢ Written procedures were received; however, this process was not observed as the process had not taken place for the City of Mableton election.

Ballot Processing Recommendations

Ballot Processing

Recommendations:

- ➤ Update the current procedures to specify how it is ensured that all ballots are tracked as they are transferred between team members. The procedures should also indicate how ballots marked "open on election day" should be retrieved and processed. In addition, procedures should be updated to capture all key sub-processes.

- ➤ Considering the complexity and environment in which the Ballot Opening and Extraction process is performed, an overall recommendation would be to have experienced staff performing this function. See 'Staffing Levels' for more recommendations.
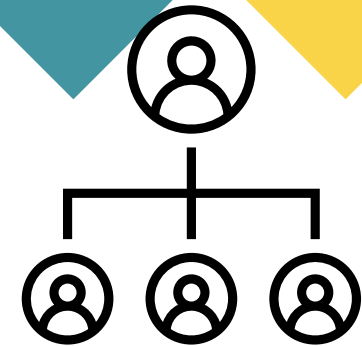
General Observations and Recommendations

System

Reporting

Training

Staffing Levels

Review of the Elections & Registration Absentee Voting Process
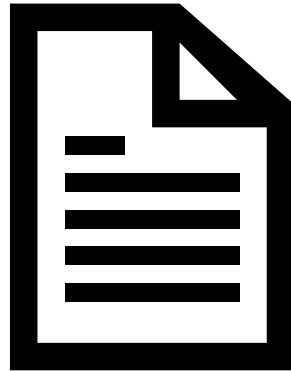
System

General – System (GARViS) & Internal

Observations:

➢ All internal network system structure and safeguards *(outside of the County's network)* need to be evaluated.

➢ System configuration issues (GARViS) noted during the rollout to include, but not limited to the following for SOS coordination:

- Virtual training was not an optimal learning environment
  - Materials insufficient for offsite participants *(i.e. availability of materials, limited access for hands-on training, etc.)*
  - Technical difficulties with the sound system and presentation
- February 8th: Issues with completing the redistricting of Mableton voters
- Issue w/Temporary address: swapped between the temporary & permanent address
- February 20th: [During Acceptance & Issuance Onsite Observation] - SOS had not entered/activated the City of Mableton Election into GARViS

General – System (GARViS) & Internal, continued...

Recommendations:

➤ Evaluate the cybersecurity and other network security safeguards to ensure that the email system is protected against viruses and attacks. This evaluation should include a determination of whether adequate backup is maintained, to ensure continued compliance with record retention guidelines.

➤ Coordinate with the Georgia Secretary of State (SOS) office to evaluate the functionality needs of GARViS to make the absentee application/ballot more effective and efficient.

Reporting

General – Reporting

Description:

Daily reports are provided to the board to track the ABM applications. A detailed daily spreadsheet of applications by pathway is logged in addition to where the application is in the process. A summary sheet is compiled based on a cumulative total of applications during the ABM period. Once the application period is closed, the spreadsheet is revised to accommodate ballots issued and returned.

Observations:

➢ Several ineffective and inefficient processes during the reporting phase to include, but not limited to the following:

  ➢ The current reporting spreadsheet is complex and does not lend itself to useful information for determining completeness and accuracy;

  ➢ The current reporting spreadsheet is not reconciled to internal logs or reports on a consistent basis;

  ➢ The current BOE reporting spreadsheet is manually intensive, and there was no evidence of validation by a separate team member prior to distribution;

General – Reporting, continued...

Observations, continued:

➢ Several ineffective and inefficient processes during the reporting phase to include, but not limited to the following (continued):

  ➢ The ballot tabulation process is manual and should be based on automated reports; and

  ➢ Errors, duplications, inaccuracies were noted in the City of Mableton daily reporting process, but <u>these did not affect the final reporting statistics.</u>

➢ Absentee ballot applications are received by one of five pathways and are recorded on the daily detailed spreadsheet for the BOE. This spreadsheet is in addition to a separate spreadsheet that is kept by the ABM lead, representing a potential duplication of efforts, that monitors applications through the Pre-Sort, highlight and lookup, and accept and issue process.

General – Reporting, continued...

Recommendations:

➢ Reconciliations and validations for reporting should be performed by team member independent of the absentee application/balloting process. For instances where the process cannot be fully segregated, mitigating, or compensating controls should be implemented. Establish procedures to reconcile reports to the respective subsidiary logs and reports, to include evidence of review. Differences and reconciling items should be identified, researched, corrected, and/or resolved in a timely manner. Documentation should be maintained and subsequently validated by an Election management employee.

➢ Based on a review of the reports sent to the board, utilizing the current reports monitored by the lead to provide a status-to-date for the applications and ballots may be more beneficial as an overview than an additional detailed accounting of the voting documents.

Training

General – Training

Observations:

- Periodic training for employees within the absentee application/balloting process should be documented and implemented to eliminate or reduce inefficiencies/inconsistencies. Periodic training will also ensure that the absentee transactions are processed in accordance with County and State requirements and expectations.

Recommendations:

- Develop and implement a periodic, internal training session to communicate and re-iterate the goals and objectives of the absentee application/balloting process. Training sessions should also be used to communicate the importance of internal control objectives and the overall expectations for Election team members. Evidence of the training should be documented and updated as needed.

Staffing Levels

General – Staffing Levels

Observations:

➢ The current resource allocation methodology is unclear. The current resource allocation methodology is based on the number of applications received, but no information was readily available to ensure that this workflow was effective and efficient. Specifically, there is not clear methodology for identifying, tracking, and monitoring how many resources are needed for ranges of application numbers.

➢ Workload standards and performance measures are needed to evaluate, manage, and report on the effectiveness, efficiency, and productivity of the absentee application/ballot process. Workload standards and performance measures provide reasonable assurance that the workload is distributed equitably between personnel, that individual team members are meeting established goals, serve as a tool for monitoring productivity, and alleviate individual burnout/feeling overwhelmed.

➢ Benchmarking Analyses are needed.

General – Staffing Levels, continued...

Recommendations:

➢ Evaluate the current resource allocation methodology for processing absentee transactions. Performance measures should be established and periodically reviewed to ensure that business objectives are met and that the absentee transactions are processed effectively and efficiently.

➢ Establish workload standards and performance measures for the absentee application/ballot processing section and by individual. Utilize the monitoring results to identify any areas of improvement and best practices needed to meet expectations, goals, and/or to increase overall efficiency.

General – Staffing Levels, continued...

Recommendations (continued):

➢ Evaluate the current organizational structure to assess whether it supports the business continuity and long-term sustainability of the Elections Department. The assessment should include, but not be limited to:

o Whether a Deputy Leadership Position is adequate to assist with the strategic, administrative, and operational tasks of fulfilling required functions and compliance with State laws, regulations, etc.;

o An assessment of employee classification needs between Full-time (FTE), Part-time (PT), and/or Seasonal with the goal of improving workload alignment based on the business need and variations in volume; and

o Identification of designated custodians/leads and backups (designated operators) for each phase of the absentee process for each election cycle and updated periodically or as needed.

Other

General – Other

Observations:

➢ Quick reference guides should be considered for ease of processing absentee applications and ballots, where needed. These guides can be used to provide streamlined guidance, protocols, sequence of steps, important dates & times, snapshot of expectations, etc. *[NOTE: Elderly DOBs, Turnaround timeframes, Color-coded box methodology, etc.]*

➢ Additional validation controls are needed. Dual validation is not consistent throughout the absentee application/ballot process. In some instances, absentee applications are transferred to each phase without an independent validation by a separate team member. Dual validation should occur during each phase to reduce the risk of loss, misappropriation, and/or inaccurate report.

➢ Operational and physical safeguards need to be evaluated. Election management needs to evaluate its overall operational and physical security measures over the processing of absentee applications. Workspace security controls should also be clearly communicated and periodically monitored.

General – Other, continued...

Observations (Continued):

➢ Manual processes need to be evaluated. The absentee application/ballot process includes several inefficient, manual processes (i.e. logs, Microsoft Excel spreadsheets, etc.). We also noted that spreadsheets are located on a shared drive, accessible to numerous Election employees, and are not system or password protected. As such, the spreadsheets can be modified and/or manipulated without any knowledge of spreadsheet users/custodians.

➢ Record retention methodology needs to be improved.

➢ No key spreadsheet controls were identified such as security/locking, validation, periodic testing of worksheet formulas and documentation of testing performed.

➢ Internal Monitoring and Supervisory Reviews need to be implemented or revised.

➢ Reporting function needs to be updated and corrected. The reporting process is manually intensive, voluminous, inefficient, and inconsistent, such that the data outputs could be easily analyzed for decision-making purposes. [Also, see 'Reporting' section]

➢ Written procedures should be revised to include additional operating practices and recommendations. [i.e. Daily email log of application, PDF frequency & supervisor vs lead, weekly audit, etc.]

General – Other, continued...

Recommendations:

➢ Implement quick reference guides at each phase of the absentee application/ballot process for consistency and efficiency.

➢ Implement dual validations at each phase of the absentee application/ballot process. Evidence of the transfer of responsibility within the absentee application/ballot process should be maintained, available for review upon request, and included in tracking, monitoring, and reporting procedures.

➢ Implement additional procedures, as identified, to ensure that adequate operational and physical safeguards and workspace security controls exist over absentee applications.

➢ Evaluate the continued need and use of manual processes and spreadsheets in the absentee application/balloting process, with the assistance/coordination of the Information Services Department. In areas where automation is not deemed possible, compensating controls should be implemented. If manual spreadsheets are continued, include system or password protection with limited access based on business need. In addition, have each spreadsheet periodically validated by a separate individual.

General – Other, continued...

Recommendations (continued):

➢ Examine the record retention procedures to ensure they are consistent with the County's record retention policy and State law, to include all supporting documents.

➢ Consider a policy or procedure on spreadsheet controls, change and access controls, backup controls and inventory of key spreadsheets.

➢ Develop and implement internal supervisory reviews, reconciliations, comparison of reports, and other monitoring activities throughout the absentee process, to include a review of the audit trail and documented evidence of completion. Consider utilizing available tools and resources to make the review process more efficient.

➢ Current reports should be evaluated to determine which reports are needed, what modifications are needed, and whether it is producing the desired results.

General – Other, continued...

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Recommendations (continued):

- ➢ Since the consulting process began, several modifications and changes have been made to the absentee application and other processes. As such, the most recent procedures and documents developed should be reviewed to ensure they are consistent with the current operation practices; high and low volume processing procedures; priority of processing absentee transactions; authority levels, monitoring, requirement, and supervisory reviews. Modifications should also be reviewed to ensure consistency among employees processing absentee applications.

Elections Management Responses to Internal Audit Recommendations*

Election Responses to Recommendations

Section	Slide No.	Slide Title	Recommendation	Response	Person Responsible	Expected Date of Completion
Absentee Application Acceptance Process	11	**Email (Sandbox) Pathway**	Access to the absentee email account should be restricted to individuals based on business need and specific job responsibilities or functions related to the email pathway. Access should be periodically reviewed with each election, at a minimum, and/or with changes in personnel. Access should also be evaluated to ensure that proper segregation of duties and monitoring activities exist.	A request to IS has been submitted to list each employee with access to the email accounts. Anyone not working directly on this workflow will be removed. A task has been added to our election Task List template to verify access prior to each election.	Elections and Registration Director (Former) and Registration Division Manager	4/14/2023
	11	**Email (Sandbox) Pathway**	Evidence to substantiate the completion of the required tasks should be documented and maintained for review to ensure that the absentee applications received via the email pathway are processed as expected.	A request has been submitted to the Technology Services Manager to help us develop functionality to meets these recommendations.	Registration Division Manager/IS	Aug. 4, 2023
	11	**Email (Sandbox) Pathway**	Coordinate with the Information Services (IS) Department to evaluate the current reporting, system functionality, and configuration needs of the absentee email pathway. Any revised configuration should result in an efficient way to separate absentee email applications, identify the assigned personnel, a categorization function to distinguish absentee email applications from non-absentee emails, a function to prevent the deletion of emails in Outlook, an audit trail to prevent changes or modifications within the email pathway, and provide the reports needed for periodic reconciliation and validation.	A request has been submitted to the Technology Services Manager to help us develop functionality to meets these recommendations.	Registration Division Manager/IS	Aug-23
	12	**Portal Pathway**	Implement procedures to ensure submitted applications have been reviewed and validated by utilizing the reports available in GARViS.	Procedures will be implemented to use the current functionality in GARViS to process and track these applications.	Registration Division Manager/ABM Team	Aug-23

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Section	Slide No.	Slide Title	Recommendation	Response	Person Responsible	Expected Date of Completion
	13	**Walk In Pathway**	Update the walk-in log to include the number of applications received so that when the applications are retrieved by Pre-Sort team members, the amount that should be in the bundle is known. The Pre-Sort team member should validate the count and both teams should acknowledge with initials and date. Procedures have been updated to perform a count and have a team member sign off.	Walk-In log will be updated and Chain of Custody controls implemented to monitor movement of Applications within the organization.	Registration Division Manager	May-23
	14	**Mail Pathway**	The designated front desk personnel (and backup, when applicable) should log the number of absentee applications received via mail each day prior to transferring to the 'Pre-Sort' team. A transfer of responsibility with dual validation should also be included and included on a log as referenced in the written procedures.	Mail log will be updated and Chain of Custody controls implemented to monitor movement of Applications within the organization.	Registration Division Manager	May-23
	14	**Mail Pathway**	The current procedures indicate that one or more people may open the envelopes, but requiring a two-person team should be considered when opening envelopes.	Agree with recommendation. We will implement this practice during the next election cycle.	Registration Division Manager	Aug-23
	15	**Fax Pathway**	Implement use of the automated report from the fax machine and review the report manually on a periodic basis (i.e. daily) to ensure completeness in processing the faxed applications.	Practice was implemented during the April Runoff Election. Procedures will be updated to include this change.	Registration Division Manager	Aug. 4, 2023
	18	**Verification Pre-Sort**	Absentee by mail applications should be stored in a location only accessible by authorized personnel or those with a business need or another compensating control implemented.	Agree with recommendation. We will use storage cages (similar to the Ballot Return Cages) for the applications and update procedures to reflect changes.	Registration Division Manager	Aug. 4, 2023
	18	**Verification Pre-Sort**	Team members should tally the number of applications at least daily and initial and date the count, then the totals should be verified by another team member/lead to ensure an accurate count of applications at the close of each day.	ABM Team Leads will meet at the end of each day to reconcile totals. This practice was implemented during the April Runoff. Procedures will be written regarding this process.	Registration Division Manager/ABM Team	May-23

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Section	Slide No.	Slide Title	Recommendation	Response	Person Responsible	Expected Date of Completion
	20	Verification Highlight & Lookup	Revise the process where only the application with missing information is returned to the Pre-sort team. Batch identification and tracking method should be implemented to indicate how both the returned and complete applications within the batches are tracked until completed.	Working on a Application Chain of Custody Form which will allow for the recommended process.	ABM Team Leads	May-23
	22	Verification Accept & Issue	Revise the process where only the application with missing information is returned to the Pre-sort team. Batch identification and tracking method should be implemented to indicate how both the returned and complete applications within the batches are tracked until completed.	Working on a Application Chain of Custody Form which will allow for the recommended process.	ABM Team Leads	May-23
Ballot Production	33	Ballot Production	Update the written procedures to include additional data manipulations or other compensating controls needed to prepare ballots for printing and packing.	Procedures will be updated to reflect the recommendations.	ABM Team Leads	Aug. 4, 2023
	33	Ballot Production	Expand the written procedures to include the required access controls for the data maintained on the jump drive. Updates should reflect the process to overwrite or remove existing data prior to re-use.	Procedures will be updated to reflect the recommendations. Will work with purchasing to secure a Standalone USB 2.0 / 3.0 / 3.1 Flash Media Thumb Drive / USB Hard Drive Compact Cloner Copier & Eraser.	Registration Division Manager/ABM Team Leads	Aug. 4, 2023
	33	Ballot Production	Team members should continue to compare and validate the number of ballots produced to the number of ballots to be mailed utilizing all available resources. Reconciliations should also ensure that discrepancies are identified in a timely manner, researched, and corrected.	Agree with recommendation. Procedures will be updated to reflect any changes	Registration Division Manager/Ballot Production Review Lead	May-23
	33	Ballot Production	Prior to the ballots being placed in the locked cage, a coversheet or slip should be included with each batch to indicate the number of ballots in a batch that has been counted by a team member and verified by another. The mail courier or another team member at the time of pickup should once again count and verify the number of ballots being received, then initial and date.	Working with the ABM Team to create an Ballot Production Chain of Custody Form.	Registration Division Manager/ABM Leads	May-23

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Section	Slide No.	Slide Title	Recommendation	Response	Person Responsible	Expected Date of Completion
Ballot Processing	46	Ballot Processing	Update the current procedures to specify how it is ensured that all ballots are tracked as they are transferred between team members. The procedures should also indicate how ballots marked "open on election day" should be retrieved and processed. In addition, procedures should be updated to capture all key sub-processes.	Working with the ABM Team to create an Ballot Production Chain of Custody Form.	Registration Division Manager/ABM Leads	May-23
	46	Ballot Processing	Considering the complexity and environment in which the Ballot Opening and Extraction process is performed, an overall recommendation would be to have experienced staff performing this function. See 'Staffing Levels' for more recommendations.	Agree with recommendations. We will look into making these changes.	Registration Division Manager	Aug-23
General	50	General - System GARViS and Internal	Evaluate the cybersecurity and other network security safeguards to ensure that the email system is protected against viruses and attacks. This evaluation should include a determination of whether adequate backup is maintained, to ensure continued compliance with record retention guidelines.	GARViS is ongoing implementation. We will continue to make recommendations/inquiries to the State.	Registration Division Manager	May-23
	50	General - System GARViS and Internal	Coordinate with the Georgia Secretary of State (SOS) office to evaluate the functionality needs of GARViS to make the absentee application/ballot more effective and efficient.	GARViS is ongoing implementation. We will continue to make recommendations/inquiries to the State.	Registration Division Manager	May-23
	54	General - Reporting	Reconciliations and validations for reporting should be performed by team member independent of the absentee application/balloting process. For instances where the process cannot be fully segregated, mitigating, or compensating controls should be implemented. Establish procedures to reconcile reports to the respective subsidiary logs and reports, to include evidence of review. Differences and reconciling items should be identified, researched, corrected, and/or resolved in a timely manner. Documentation should be maintained and subsequently validated by an Election management employee.	Agree with recommendation. The Staff is working on reconciliation reporting tools.	Registration Division Manager	Aug-23

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	54	**General - Reporting**	Based on a review of the reports sent to the board, utilizing the current reports monitored by the lead to provide a status-to-date for the applications and ballots may be more beneficial as an overview than an additional detailed accounting of the voting documents.	Agree with recommendations. We will send a revised spreadsheet to the Board using the IA recommendations for approval.	Registration Division Manager	Aug-23
	56	**General - Training**	Develop and implement a periodic, internal training session to communicate and re-iterate the goals and objectives of the absentee application/balloting process. Training sessions should also be used to communicate the importance of internal control objectives and the overall expectations for Election team members. Evidence of the training should be documented and updated as needed.	Agree with recommendations. This idea has already been discussed with the ABM Leads. We plan to have summer training sessions.	Registration Division Manager	May-23
	59	**General - Staffing Levels**	Evaluate the current resource allocation methodology for processing absentee transactions. Performance measures should be established and periodically reviewed to ensure that business objectives are met and that the absentee transactions are processed effectively and efficiently.	Adding new procedural measures to capture employee performance and workload balance.	Registration Division Manager/ABM Team Leads	May-23
	59	**General - Staffing Levels**	Establish workload standards and performance measures for the absentee application/ballot processing section and by individual. Utilize the monitoring results to identify any areas of improvement and best practices needed to meet expectations, goals, and/or to increase overall efficiency.	Adding new procedural measures to capture employee performance and workload balance.	Registration Division Manager/ABM Team Leads	May-23

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	60	**General - Staffing Levels**	Evaluate the current organizational structure to assess whether it supports the business continuity and long-term sustainability of the Elections Department. The assessment should include, but not be limited to: *Whether a Deputy Leadership Position is adequate to assist with the strategic, administrative, and operational tasks of fulfilling required functions and compliance with State laws, regulations, etc.; *An assessment of employee classification needs between Full-time (FTE), Part-time (PT), and/or Seasonal with the goal of improving workload alignment based on the business need and variations in volume; and *Identification of designated custodians/leads and backups (designated operators) for each phase of the absentee process for each election cycle and updated periodically or as needed.	1) Discussion of whether a Deputy position is needed had already begun prior to this evaluation and will continue with County leadership. We agree that further evaluation of FTE and PT versus seasonal is needed during future budget development sessions. 2) A formal designation of designated leads and backups will be produced prior to each election cycle.	Public Services Agency Director, Elections and Registration Director (NEW) & Registration Division Manager	1) FY2025/26 2) August 2023
	64	**General - Other**	Implement quick reference guides at each phase of the absentee application/ballot process for consistency and efficiency.	We agree that QRGs are needed and had planned to develop after full procedure review was completed.	Registration Division Manager	Aug-23
	64	**General - Other**	Implement dual validations at each phase of the absentee application/ballot process. Evidence of the transfer of responsibility within the absentee application/ballot process should be maintained, available for review upon request, and included in tracking, monitoring, and reporting procedures.	A Chain of Custody Form will be attached to batches of applications and ballots to monitor movement within the organization. Applications and Ballots will have check-in/out logs.	Registration Division Manager	Aug-23
	64	**General - Other**	Implement additional procedures, as identified, to ensure that adequate operational and physical safeguards and workspace security controls exist over absentee applications.	Team Leads will check in/out applications and ballots to deploy to staff.	Registration Division Manager	Aug-23

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Section	Slide No.	Slide Title	Recommendation	Response	Person Responsible	Expected Date of Completion
	64	General - Other	Evaluate the continued need and use of manual processes and spreadsheets in the absentee application/balloting process, with the assistance/coordination of the Information Services Department. In areas where automation is not deemed possible, compensating controls should be implemented. If manual spreadsheets are continued, include system or password protection with limited access based on business need. In addition, have each spreadsheet periodically validated by a separate individual.	We will work with IS or implement password protection on spreadsheets as required.	Registration Division Manager/IS	Aug-23
	65	General - Other	Examine the record retention procedures to ensure they are consistent with the County's record retention policy and State law, to include all supporting documents.	Record retention procedures are already in place. Legally identified records are turned over to the Clerk of Superior Court. Those identified for retention by this office are marked for shredding after the required period of two years.	N/A	Complete
	65	General - Other	Consider a policy or procedure on spreadsheet controls, change and access controls, backup controls and inventory of key spreadsheets.	Registration Manager will work with other management staff to develop these protocols.	Registration Division Manager	May-23
	65	General - Other	Develop and implement internal supervisory reviews, reconciliations, comparison of reports, and other monitoring activities throughout the absentee process, to include a review of the audit trail and documented evidence of completion. Consider utilizing available tools and resources to make the review process more efficient	Registration Manager will work with the ABM Managerial Staff on creating tools to manage workload and efficiency.	Registration Division Manager/ABM Supervisory Staff	Jul-23
	65	General - Other	Current reports should be evaluated to determine which reports are needed, what modifications are needed, and whether it is producing the desired results.	Staff will review current reports and make modifications based upon recommendations.	Registration Division Manager	Jul-23

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	66	**General - Other**	Since the consulting process began, several modifications and changes have been made to the absentee application and other processes. As such, the most recent procedures and documents developed should be reviewed to ensure they are consistent with the current operation practices; high and low volume processing procedures; priority of processing absentee transactions; authority levels, monitoring, requirement, and supervisory reviews. Modifications should also be reviewed to ensure consistency among employees processing absentee applications.	Modifications will be made to procedures that is inclusive of volume needs.	Registration Division Manager	Aug-23

Thank you

Thank you to the Elections & Registration team for their cooperation in the midst of an existing Election!

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