

REVIEW OF THE REGISTRATION & ELECTIONS ABSENTEE VOTING PROCESS

FULTON COUNTY - OFFICE OF THE COUNTY AUDITOR

MAY 6, 2024

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ENGAGEMENT SCOPE

- Objective: To assess the effectiveness and efficiency of the absentee voting process and evaluate whether adequate controls exist throughout the process.
- Scope: Absentee voting transactions between November 2023 through February 2024, to include onsite observations of the absentee voting process during the General Election and the Primary Election for Fulton County, Georgia.



BACKGROUND

Purpose: To observe the preparation, mail out, receipt, opening, and processing of absentee ballots for the November 7, 2023, General Election and the March 12, 2024, Primary Election for Fulton County, Georgia. Additionally, to determine whether controls are operating effectively and efficiently.



PROCEDURE

The Office of the County Auditor notified the Department of Registration and Elections of an on-site observation of the preparation of the absentee ballot process to be conducted on Friday, February 9, 2024, with an observation of the mailing of these ballots to occur on Monday, February 12, 2024. We obtained the Absentee by Mail processes and procedures and the Absentee Ballot Overview documents from the Absentee Manager to become familiar with the processes and plan steps for the observation.

The observation took place at the Registration and Elections (R&E) HUB in a designated room. As a result of a cyber attack on Fulton County Government at the end of January 2024, the Georgia Secretary of State restricted the use of the Georgia Registered Voter Information System's website (GARViS) to one room within the R&E Hub. We also observed the stuffing of ballots in the mailroom. Under normal circumstances, the envelopes would be addressed and stuffed with inserts in the absentee area and then stuffed with ballots in the mailroom.



2. ABSENTEE APPLICATION ACCEPTANCE PHASE

ABSENTEE APPLICATION ACCEPTANCE PROCESS

Pathways

- Mail
- Walk-In
- Email
- Fax
- GARViS

Verification Process - thoroughly review the application:

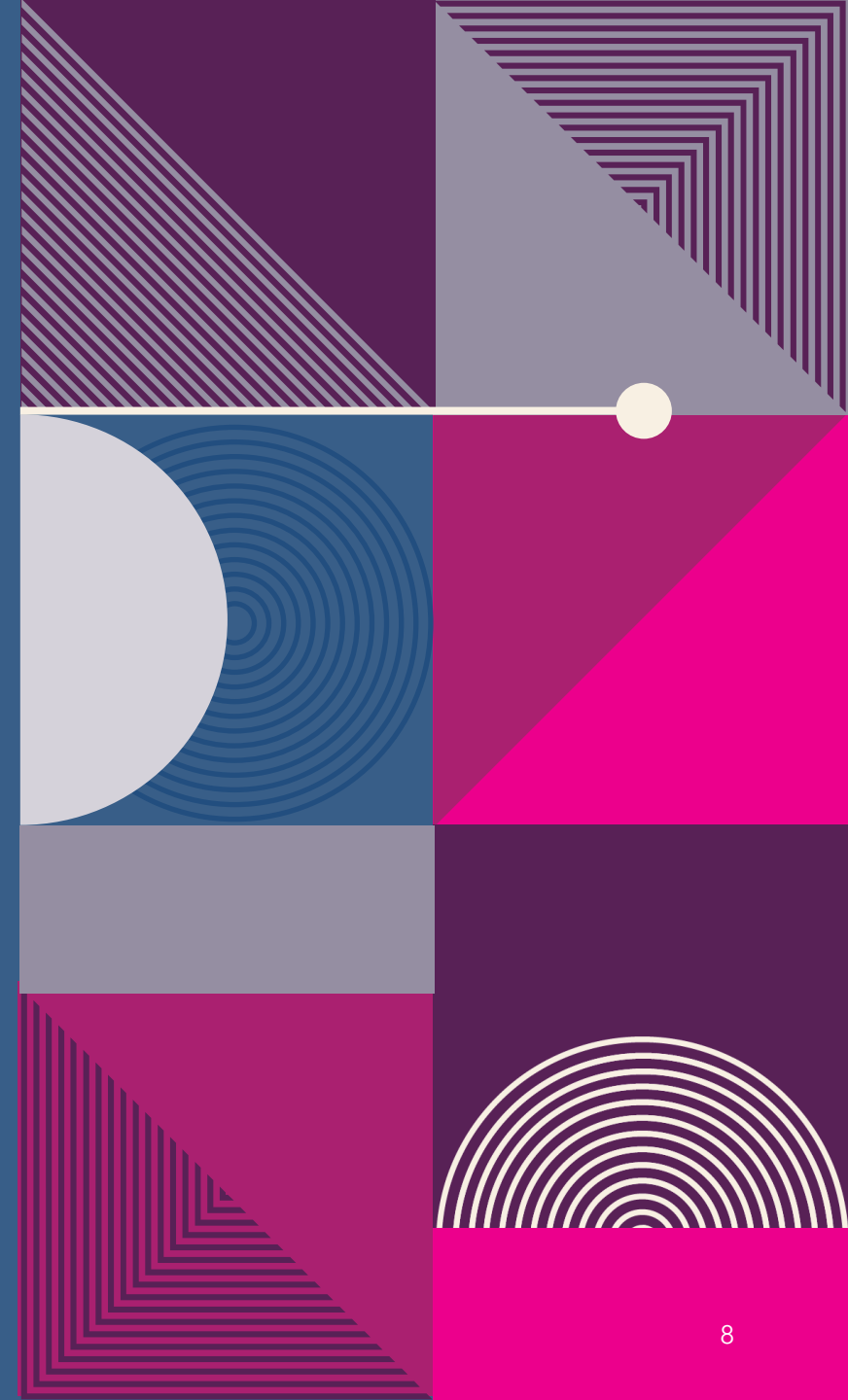
- Name mirrors GARViS
- DOB
- Drivers License or acceptable form of ID
- Original pen & ink signature
- Highlight mailing address

MAIL

Description: Ballots received by mail are delivered to the receptionist and placed in a sealed ballot box. The ballot box is retrieved once daily by the mail courier and taken to the mail room, where the envelopes are opened, applications removed, date/time stamped on each page, stamped "received by mail", recorded on the Daily Count Sheet and the envelopes maintained.

Observation: At the time of our visit there were no mailed applications to observe.

Recommendation: None

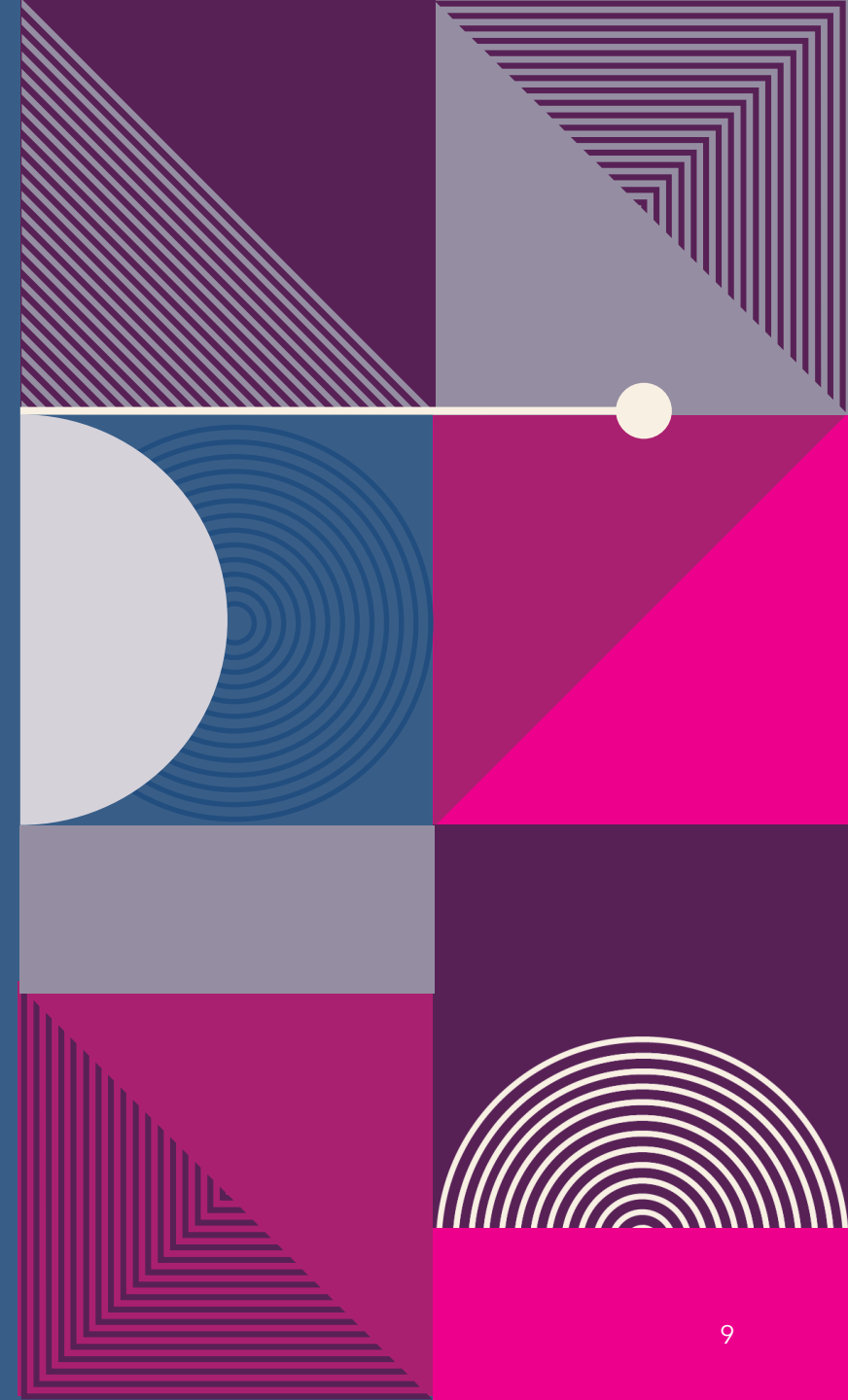


WALK-IN

Description: Absentee ballot applications are accepted by Election's staff at the walk-up windows at the Registration & Elections Hub. A signed affidavit must be completed for each walk-in ballot submitted, attesting the individual's identity and the authorization to vote.

Observation: At the time of our visit, there were no walk-in ballots to observe.

Recommendation: None



EMAIL AND FAX

Description: Absentee ballot applications are accepted via email using the elections.absentee@fultoncountyga.gov email address and printed. Applications are also retrieved from the fax machine at designated times. Both emails and faxes are date/time stamped, stamped "Received by FAX/EMAIL", logged on the "Daily Count Log of applications" and then placed in the Pre-Sort area.

Observation: At the time of our visit, there were no emails or faxes retrieved; however, we viewed the Daily Count Log Sheet showing the number of applications received by date through the various pathways, including email and fax.

We also noted that all Absentee Division staff have access to the above email account to answer any questions, although one individual is assigned to monitor the incoming absentee ballot emails.

Recommendation: We recommend updating procedures to include the processes for handling and reconciling absentee ballots through the various pathways to ensure proper handling and reconciling of ballots. Additionally, ensure that the Absentee staff members handling the ballots are identifiable.

GARVIS

Description: Absentee ballot applications are completed and accepted via the Secretary of State (SOS) Online Voter Registration portal. Absentee Specialists access the applications submitted via the portal by logging into GARViS, Georgia Registered Voter Information System. Applications are printed for the record, date stamped, and logged on the “Daily Count Log of Applications”.

Observation: During our visit, we did not observe the printed applications received in GARViS; however, we reviewed the Daily Count Log of Applications noting the submissions received through the GARViS portal.

Recommendation: None

An abstract geometric design on the left side of the slide. It features a dark blue background with various shapes and patterns: a white circle at the top left, a grey semi-circle, a pink hatched triangle, a blue square with concentric circles, a pink square with a white hatched pattern, a grey triangle, and a pink triangle. The design is separated from the text by a white diagonal line.

3. BALLOT PRODUCTION AND MAIL OUT PHASE

PREPARATION FOR MAILING ABSENTEE BALLOTS

Description: Absentee ballot applications can be requested via the Fulton County website or downloaded from the Secretary of State Website. The absentee ballots are to be prepared for mailing no more than 29 days, and no later than 25 days before a primary election per O.C.G.A 21-2-384. Furthermore, the application must be agreed to the GARViS voter information system; address, name, license or ID, and signature must be verified. If the information does not agree, a voter registration application should be completed. If it is not completed, the voter is sent a provisional ballot that must be cured.

To prepare the ballots for mailing, the Absentee Voter Report is pulled from GARViS. This report shows the individuals who have applied and requested an absentee ballot, it also contains the mailing address, precinct, and party. The address labels are prepared and printed for processing.

Observation: The mailing labels were printed prior to our arrival, although we observed the Absentee Manager log into GARViS, pull the Absentee Voter Report, select the election date of March 12, 2024, and accept the report. The report was filtered by application status of “accepted”, and then filtered to show Absentee by Mail”. The manager excluded the “UOCAVA” or military ballots, for those that were previously mailed. The number of voters on the list totaled 782 voters. The last filter performed was by political party, to show democratic and republican. This identification is important to ensure the correct ballot is provided to the voter. A pivot table was prepared to obtain the total number of ballots by precinct and political party.

The mailing labels consisted of two labels for each voter. One label contained the voter’s name along with a mailing address; the second label contained the voter’s name, election date of March 12th, precinct, voter registration number, and political party.

We observed the Absentee Officers placing the address label on the white mailing envelope and the name label on the yellow oath envelope to be placed inside the white envelope, along with an instruction pamphlet and a privacy envelope. The envelopes are then housed in a mail bin for processing. Once this process is complete, each Absentee Officer takes their respective mail bin to the mail room for ballot stuffing and verification.

Recommendation: We recommend updating the procedures to include all steps observed and potential issues that may arise during the mailing process, along with mitigating controls to address any issues.

STUFFING OF ENVELOPES

Description: The ballots are stored in a locked file cabinet within the mailroom located inside the Elections Hub. **Note:** The mailroom is a segregated area enclosed by a chain link fence. The mailroom is locked and accessible by authorized personnel with a key card only. Three election employees must be present in the mailroom (whenever ballots are present) in accordance with Election Code 21-2-386 (2)(A).

The Absentee Officer notifies the Registration & Elections Mail Courier that ballots are needed for the respective precinct and the political party. (The mail couriers sort the ballots by precinct and political party before storing them.) The ballots are provided to the Absentee Officer to begin stuffing the envelopes, along with a review of the ballot to ensure the accuracy of the precinct located in the upper left-hand corner of the ballot.

Observation: We observed the placing of ballots into the white envelopes and noted that the Absentee Officer verified the precinct number and the political party without exception.

Recommendation: None

VERIFICATION OF MAILING ENVELOPES

Description: The absentee voters' names on the Absentee Voter Report are compared to the mailing envelopes to ensure that each voter who has requested a mailed ballot has an envelope prepared. If there are any errors or omissions identified, it is corrected immediately before proceeding to the next voter on the list.

Observation: We observed the verification of the Absentee Voter Report to the mailing envelopes by the Absentee Officers. This verification included the confirmation of the name, address, precinct, and political party. The envelope was also reviewed to ensure all inserts, including ballots were present within the white mailing envelope. We observed one envelope that did not include a ballot; it was inadvertently omitted. The ballot was requested for the political party and precinct and placed in the envelope.

Recommendation: Upon review of the procedures, steps for handling missing and omitted ballots are not addressed. We recommend updating the procedures to include the specific steps that should be followed during the verification process and any necessary controls that should be followed to ensure the accuracy of the mailing envelopes.

VERIFICATION OF BALLOTS

Description: The verification process consists of verifying that the correct ballot is in the mailing envelope; name, address, precinct, and the type of ballot (Republican or Democrat). The verification process takes place in the mailroom and the staff are paired in twos. The first mail-out occurred on February 12, 2024, and the last day a ballot can be requested is March 1, 2024, for the upcoming election on March 12, 2024. This election is a Primary Presidential Preference (PPP). A presidential preference primary is a primary election in which a voter indicates a preference for a particular candidate to be a party's nominee for the presidency.

Observation: We observed the Absentee Specialist reading the information from the manifest, and the Absentee Supervisor ensuring the information was accurate on the absentee ballot. The information from the manifest is pulled from (GARViS), daily, up until March 1st, (for this election). The manifest contained information for both the Democratic and Republican parties; blue highlights on the manifest represented provisional ballots. Provisional ballots, also known as “challenge” or “affidavit” ballots in some states, are required by the federal Help America Vote Act of 2002 (HAVA). When there is uncertainty about a voter’s eligibility—the potential voter’s name is not on the voter rolls, a required identification document isn’t available, or another issue arises—the election official is required to offer the voter a provisional ballot instead of a regular ballot. Standards for handling provisional ballots are determined by state law.

Recommendation: We recommend updating the procedures to reflect all steps observed.

COUNTING OF THE BALLOTS

Description: Once the Absentee Ballots are verified, the Mail Courier sends the ballots through the counter and agrees the ballot count to the manifest count.

Observation: We observed the counting of the ballots and noted the first count did not agree to the manifest total of 814 ballots. The courier performed a recount by running the ballots back through the counter to ensure all ballots were accounted for. After the recount, the total agreed to the manifest total of 814. One ballot was inadvertently left on the table.

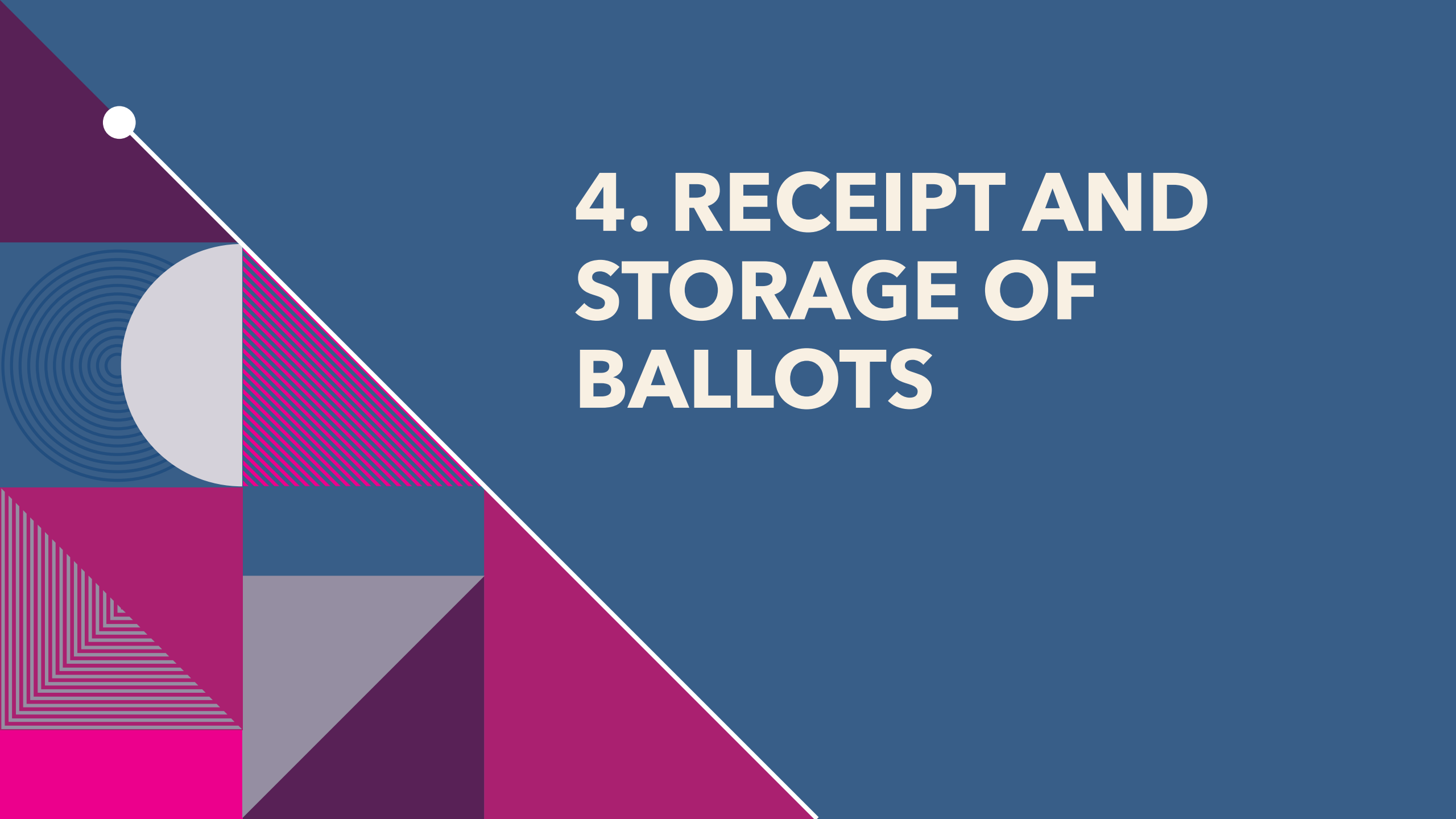
Recommendation: We recommend updating the procedures to include all steps observed to ensure processes performed by all staff are consistent and to ensure all requested ballots are mailed to the respective voter.

SAFEKEEPING OF THE BALLOTS

Description: Once all envelopes are verified, the mail bins are placed in the locked file cabinets and locked by the Mail Courier. The envelopes will remain locked until mailing on Monday, February 12, 2024. The ballots are sealed by the Mail Couriers, locked in the ballot boxes and taken downtown to the Fulton County Government Center for mail out.

Observation: We observed the sealing of the ballots. We did not observe the ballots being transported downtown. We were informed that there must be at least 2 Mail Couriers traveling with the ballots. We were unable to verify the consistency of steps performed, given the absence of written procedures.

Recommendation: We recommend drafting detailed written procedures for the transporting and mailing of absentee ballots. Written procedures streamline departmental processes and maximize consistency.

The background features a complex abstract design. A prominent diagonal line runs from the top-left to the bottom-right. To the left of this line, there are several geometric elements: a white circle at the top-left corner, a grey semi-circle, a pattern of concentric circles, a pink square with a white grid pattern, and a grey triangle. The right side of the image is a solid blue background with the text.

4. RECEIPT AND STORAGE OF BALLOTS



VERIFICATION - RECEIPT AND STORAGE OF BALLOTS

Description: Absentee ballots are returned via dropbox, walk-in, or mail. Dropbox ballots are obtained from each advanced voting location by the R&E Supply and Logistics Division. The ballots are brought back to the Elections HUB and locked in a retention cage until the chain of custody passes to the mail courier. Absentee ballots received via walk-in and mail are delivered to the front desk reception and placed in a sealed ballot box until retrieved by the R&E Mail Courier.

The Mail Courier takes possession of the ballots, and they are stored in a locked file cabinet within the mailroom which is located inside the Elections Hub. The mailroom is a segregated area enclosed by a chain link fence and is accessible only by authorized persons with a key card. As previously noted, there must be three election employees within the mailroom (whenever ballots are present) per the election code. The R&E mail courier cuts the seal from the ballot box to run the ballots through the time and date stamp machine.

Observation: We observed Mail Couriers cut the seal and run ballots through the machine and noted the current day's date stamp and time on the ballots.

Recommendation: We recommend ballots be pre-sorted to determine initial issues with applications containing missing information or other issues so staff can continue with verification and acceptance of ballots.



VERIFICATION - BALLOT ACCEPTANCE

Description: The Oath is opened on each ballot to ensure all required information is included to give credit to the elector. The Oath is reviewed for the following information:

- Signature and printed name
- Voter Identification (DL# or Identification Card #) **or**
- If no ID, include SS# **or**
- Selection marked to place another form of acceptable ID within the ballot envelope

Observation: We observed the Absentee Specialists sign onto GARViS with a username and password with a 2-step verification process. The elector on the ballot was searched using the voter registration number listed on the ballot envelope; name and mailing address verified; ballot mail-out date reviewed; receipt date and time of returned ballot entered and performed by placing a check in the accepted box in the system. After ballots are accepted in the GARViS system, an Absentee Ballot Supervisor or another individual on the Absentee Ballot Team will verify that the accepted ballots have been marked accepted in the system noted by “accepted” and the date.

We also observed the Absentee Officer verify a batch of absentee ballots that were designated as “accepted”. No issues were found. Ballots were placed back in the designated tray and then placed in a tray by precinct in precinct order.

Recommendation: Currently, the Absentee Ballot Supervisor or other designated absentee specialist can verify the accepted ballots. We recommend “Another individual” be specifically identified by title to set clear roles and responsibilities for individual team members.



VERIFICATION - BALLOT ACCEPTANCE, CONTINUED...

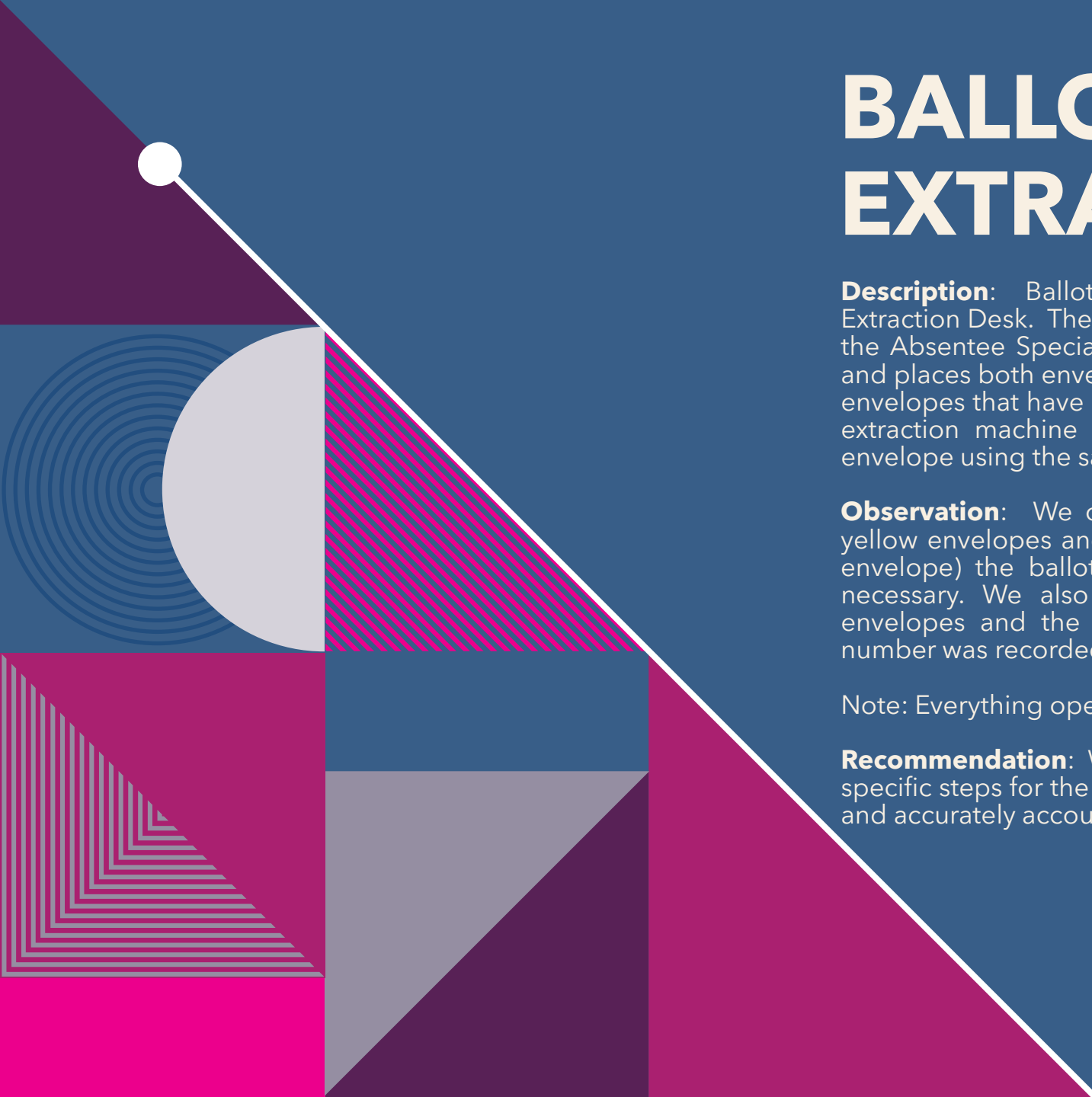
Description: Once the ballots are accepted, they are grouped into batches of 50. This grouping is performed by a Mail Courier in the Absentee Division using the electronic sorter machine. A green batch sheet is placed with the batched ballots which lists the precinct name, precinct number, and total number of ballots. The ballots are placed in a sealed cage, removed from the mail room, and rolled to the processing area. The Absentee Manager runs a report to show the total number of absentee ballots and compares the total to the physical ballot count.

Observation: We observed that the report total was agreed to the total number of batched ballots without exception. The batched ballots were placed in a cage, sealed, and rolled to the processing area accompanied by the Absentee staff. Once in the processing area, the seal was cut and the seal # was verified on the seal manifest, along with the number of ballots.

Recommendation: We recommend updating procedures to include the above processes for handling, reconciling, and safeguarding accepted ballots.

An abstract geometric design on the left side of the slide. It features a grid of colored squares: a bright pink square at the top left, a grey square below it, a dark purple square at the bottom left, and a blue square at the bottom center. The pink square contains a white semi-circular pattern of concentric lines. The grey square contains a white semi-circular pattern of concentric lines. The dark purple square contains a white semi-circular pattern of concentric lines. The blue square contains a white semi-circular pattern of concentric lines. A white line with a circular dot at its end extends from the top left towards the center. The background is a solid magenta color.

5. BALLOT EXTRACTION AND PROCESSING PHASE



BALLOT EXTRACTION

Description: Ballots are opened using the ballot extractor machine at the Rapid Extraction Desk. The machine opens the ballots two at a time in an upright position and the Absentee Specialist removes the white ballot envelope from the yellow envelope and places both envelopes in the respective bin/tray. The machine shows the number of envelopes that have been opened and that number is verified with the batch total. The extraction machine is also used to extract the actual ballot from the white ballot envelope using the same process as above.

Observation: We observed the extraction of the ballots and noted there were 50 yellow envelopes and 49 ballot envelopes. (1 ballot was turned without a white ballot envelope) the ballot is kept with the yellow envelope for additional information if necessary. We also observed the ballots being extracted from the white ballot envelopes and the extractor count was verified with the ballot number. The total number was recorded and signed by two individuals.

Note: Everything opened must be scanned by law.

Recommendation: We recommend updating the written procedures to include the specific steps for the ballot extraction process to ensure all ballots are handled properly and accurately accounted for.



PREP STATION

Description: The Absentee Specialist unfolds the ballots and reviews them for any tears, extra marks, or anything that could prevent the ballot from being scanned and recorded. Any issues are put to the side as potential issues. Issues may also go through a voter review process.

Observation: We observed one ballot with a smeared mark next to a selection. We were told that it may not scan and accept the selection, although it was included and scanned successfully. We were also notified that if this was a partisan election, the ballot would be held for review by the partisan party to determine the selection. During a municipal election, the respective city of the elector would provide an appointee to determine the intention of the elector.

Recommendation: We recommend updating the written procedures to include the process involved in prepping ballots.



SCANNING

Description: Prior to scanning the ballots, the Absentee Specialist ensures that the scanner count shows “0”, noting that no other ballots have been scanned into the machine before proceeding. All 50 ballots are placed on the scanner and the total number scanned per the machine should total 50 or the number of ballots scanned, if less than 50. The specialist must select “Accept Batch” on the computer screen to submit the batch. A Scanned Ballot Manifest is completed with the scanner machine number, total scanned, date, and time and signed by the specialist. The manifest is kept in front of the scanner.

Observation: We observed the scanning of 50 ballots on scanner #1, noting the acceptance of the scanned ballots and recording information on the manifest. Dual signatures were required.

Recommendation: We recommend updating the written procedures to include the specific steps for ballot scanning.



6. BALLOT UPLOAD & RETENTION

BALLOT UPLOAD

Description: The scanned and counted ballot information is uploaded to the GARViS system by the Information System personnel in the server room.

Observation: We observed the data upload, noting the information from the ballot scan was transmitted to the server. We reviewed the results from the Tally and Reporting (tabulate/calculate votes). However, the results could not be validated until after 7 p.m. on Election Day.

Recommendation: None



BALLOT RETENTION

Description: Scanned ballots are placed inside a ballot retention box, labeled, and stored according to the retention policy for two years.

Observation: We did not observe the storing of the ballots.

Recommendation: We recommend updating the written procedures to include the specific steps for ballot retention.

7. CONSENT ORDER

CONSENT ORDER

Description: As part of the consent order associated with SEB Case 2021-181, the Fulton County Board of Registration and Elections agreed to implement written policies and procedures for risk-limiting audits for all elections for which risk-limiting audits (RLA) are required under SEB Rule 183-1-15-04. Additionally, they agreed to adequately train all election staff involved in conducting an RLA in advance of each election.

Observation: During our visit, there was no RLA performed, however, we were provided with RLA Standard Operating Procedures – per SOS Directives, that are followed when conducting an RLA. We were also provided with the General Election Risk Limiting Audit Oath and the Oath of Consolidation Assistants Forms which are required before any staff can engage in an RLA. Furthermore, we were provided an RLA training video that plays continuously during the RLA audit process as a training tool.

Recommendation: We recommend implementing an acknowledgment form to be signed by election staff noting that they have undergone the required RLA training prior to the election.

8. RECOMMENDATIONS





As a result of our review of the Registration & Elections Absentee Voting Process, we have the following recommendations:

1. We recommend updating procedures to include the processes for handling and reconciling absentee ballots through the various pathways to ensure proper handling and reconciling of ballots. Additionally, ensure that the Absentee staff members handling the ballots are identifiable.
2. We recommend updating the procedures to include all steps observed and potential issues that may arise during the mailing process, along with mitigating controls to address any issues.
3. We recommend updating the procedures to include the specific steps that should be followed during the verification process and any necessary controls that should be followed to ensure the accuracy of the mailing envelopes.
4. We recommend updating the procedures to include all steps observed to ensure processes performed by all staff are consistent and to ensure all requested ballots are mailed to the respective voter.
5. We recommend ballots be pre-sorted to determine initial issues with applications containing missing information or other issues so staff can continue with verification and acceptance of ballots.
6. We recommend “Another Individual” be specifically identified by title to set clear roles and responsibilities for individual team members.
7. We recommend updating procedures to include a detailed breakdown of the processes for handling, reconciling, and safeguarding accepted ballots.
8. We recommend updating the written procedures to include the specific steps for the ballot extraction process to ensure all ballots are handled properly and accurately accounted for.
9. We recommend implementing an acknowledgement form to be signed by election staff noting that they have undergone the required RLA training prior to the election.



THANK YOU

Office of the County Auditor

Anthony Nicks, CIA, CFE, CGAP

County Auditor