

Exploring Audits: Part Two

Conducting a Voter List Maintenance Audit

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The
Elections
Group

Introduction

Voter list maintenance is the systematic process by which election officials ensure that information in their jurisdictions' voter registration database is up-to-date and accurate. Voter list maintenance audits help ensure that:

- Eligible voters vote easily, without delay caused by an inaccurate or out-of-date record;
- Votes are not cast in the name of ineligible voters, whether by those voters or others; and
- The public trusts the integrity of the voter rolls by timely processing deceased records or voters who have moved.

Election skeptics have raised allegations that inaccurate voter rolls are enabling widespread election fraud. While those allegations are unsubstantiated, it is the case that some jurisdictions do not regularly complete required list maintenance processes. **Audits of list maintenance practices can address skepticism and ensure compliance by highlighting the overall accuracy of voter rolls and robust efforts undertaken to keep them accurate and up-to-date.** A list maintenance audit may also identify list maintenance practices that need improvement or point to gaps in federal or state laws.

The voter list maintenance audit process systematically:

- 1 Reviews a jurisdiction's methods for performing list maintenance.
- 2 Ensures that all relevant federal and state regulations are followed.
- 3 Ensures list maintenance is being conducted in a deliberate, systematic way.
- 4 Produces public reports showing that the voter rolls are reviewed regularly and carefully to ensure that eligible voters are correctly added and updated while ineligible voters are removed.

Standards

1

The audit is conducted at least once per election cycle, using a sampling percentage so that the workload is manageable.

2

The audit is performed by different individuals than those who initially performed list maintenance tasks.

3

Auditors should be subject to the same background checks and security protocols as the individuals performing the voter registration data entry and list maintenance.

4

Voters' personal identifiable information (PII) must be kept secure.

5

A timely post-audit report is drafted in plain language and made available to the public.

Getting Started

Reports and Materials Needed

- Primary source materials used for list maintenance such as:
 - National change of address (NCOA) reports
 - USPS service and carrier returns
 - US Social Security Administration reports¹
 - Electronic Registration Information Center (ERIC) reports
 - Federal, state, and local county and conviction records
 - State public health reports
 - Voter-provided information, etc.
- List maintenance standard operating procedures. These should include instructions on how to process each of the source materials listed above as well as applicable timelines for notices and actions for a voter's failure to respond to notices.
- Voter registration system logs or reports that establish when key list maintenance events occurred (e.g. NVRA cancellation report detailing the date and time event occurred and the count of records canceled).
- A comprehensive checklist or form that outlines the specific criteria to be reviewed during the audit and identifies who performed the review and when. (A sample Audit Checklist Template is available below.)
- Applicable statutes including National Voter Registration Act (NVRA)², Help America Vote Act (HAVA)³, state voter registration statutes, and applicable regulations or state election procedures manuals
- Auditors will need access to a workstation with the voter registration database. Auditor sign-in credentials should be in "read only" mode and limited to those screens needed to conduct the audit.

Who Conducts the Audit?

- It is impossible to audit list maintenance activities without examining personal identifying information (PII) such as full birth dates and driver's license and/or social security numbers to differentiate between people who share the same name.
- Protection of PII is a paramount consideration, so audit planners will need to carefully consider who conducts the audit. Typically, staff undergo a background check before gaining access to the voter rolls, and list maintenance auditors should meet the same criteria.

¹ These may include Social Security Administration Death Master List or State and Territorial Exchange of Vital Events (STEVE) records.

² See <https://www.justice.gov/crt/national-voter-registration-act-1993-nvra>

³ See https://www.eac.gov/about_the_eac/help_america_vote_act.aspx

- If it is unfeasible to recruit auditors independent of the election office, the audit team should consist of auditors who were not part of the original data entry process. A staff loan from a separate unit of county or local government, or even a swap of data entry staff with a neighboring jurisdiction are other possible considerations.
- Auditors should work in pairs, with different partisan affiliations or primary voting records whenever possible.

Who Observes the Audit?

For voter list maintenance audits, it may not be practicable or meaningful for the audit event to be open to the general public. However, the public should be given timely access to the post-audit report.

- List maintenance activities and the audit of that work requires concentrated, meticulous work including a quiet space that does not detract from the work.
- The need to maintain privacy of personally identifying information also limits direct observation of list maintenance audits.

Considerations for Observers

Observers can enhance election audit transparency by opening the audit event to additional members of the community. Some general considerations when observation is feasible and allowed by law.

- *Observers must not direct or interfere with the audit process or compromise the security and privacy standards for the audit.*
- *Public notice should be given to announce opportunities to observe audit events.*
- *A member of staff should be designated as an observer liaison to help answer questions.*
- *Materials such as handouts should be available so observers understand the audit process.*

When Should the Audit Take Place?

- At a minimum, an audit should be conducted prior to each election cycle.
- Audits should also be done after the undeliverable election mail from each general election has been processed.
- A list maintenance audit is a major undertaking that should be scheduled away from other time-sensitive activities.
- Ensuring that the audit is both meaningful and achievable should be a priority when determining the timing of the audit.

Conducting the Audit

Auditors should be familiar with applicable state statutes and regulations, the audited jurisdiction's voter registration checklists, standard operating procedures, staff task assignments, etc. before conducting the audit.

Create Master Audit Spreadsheet

- Import each primary source document into a spreadsheet, creating a separate tab or worksheet for each report being reviewed.
 - For example, NCOA, ERIC reports, department of correction reports, etc. would each be imported into a separate worksheet.
 - Add a column with the name of the primary source report (NCOA, ERIC, etc.)
- Create a Master Audit Report worksheet. This will be the worksheet where the randomly selected records from each primary source document are stored and reviewed.
 - Consider adding columns to this worksheet for each of the audit questions from the Audit Checklist Template including Yes/No or Pass/Fail columns.
 - Add columns for notes, questions or additional follow up.

Random Selection

- Determine an appropriate sample size⁴ for each primary source report.
- Using a random selection method, such as a random number generator, randomly select the appropriate number of records from each primary source report (each individual worksheet).
- Transfer randomly selected records to the Master Audit Report worksheet.

Review Individual Records

- Using the Audit Checklist Template questions, auditors review each record in the Master Audit Report and corresponding voter record from the voter registration database.
- Determine if the record was accurately added/updated/removed.
- Note any questions or issues.

⁴ Further research is needed to determine an adequate initial sample size.

Audit Organization Practices

Create a separate checklist that looks at the jurisdiction’s list maintenance policies and practices. Questions may include:

- Do database system logs indicate the jurisdiction ran the scripts for system wide list maintenance activities? (Review county or state SOPs for executing system wide list maintenance activities (e.g. generating voter move notices, running the NVRA cancellation script).)
- Does the organization have written policies and procedures?
- Does the organization provide regular training for staff?
- Does the organization perform regular, quality control checks?

Audit Reports

- Compile data and information for reports
- Provide feedback for process improvement
- Make reports public

Sample Audit Tables

Create a spreadsheet with separate tabs or worksheets for each report being reviewed. For example, NCOA, ERIC reports, public health records, etc. would be separate worksheets.

Auditor Results - NCOA				
Voter ID	NCOA Status	Notice Sent?	Audit Status	Notes
111	Inactive - Moved Within County	Sent	Inactive - Moved Within County	
222	Inactive - Moved Within County	Sent	Inactive - Moved Within County	
333	Inactive - Moved Within County	Sent	Inactive - Moved Within County	
444	Inactive - Moved Out of County	Sent	Inactive - Moved Out of County	
555	Inactive - Moved Out of State	No Notice	Active	Incomplete minimum matching criteria

Auditor Results - ERIC

Voter ID	NCOA Status	Notice Sent?	Audit Status	Notes
1100	Registered Out of State	Sent	Cancelled - Moved	
2200	Registered Out of State	Sent	Cancelled - Moved	
3300	Registered Out of State	No Notice	Inactive - Undeliverable Ballot	Clerical error. Recommend staff review
4400	Registered Out of State	Sent	Cancelled - Moved	
5500	Registered Out of State	No Notice	Cancelled - Moved	

Auditor Results - Public Health Records

Voter ID	NCOA Status	Audit Status	Notes
1010	Cancelled - Deceased	Cancelled - Deceased	
2020	Cancelled - Deceased	Inactive - Failed to Vote	Incomplete minimum matching criteria
3030	Cancelled - Deceased	Cancelled - Deceased	
4040	Cancelled - Deceased	Canceled - Deceased	
5050	Canceled - Deceased	Canceled - Deceased	

Sample Audit Summary Table

List Maintenance Operations Audit covering operations in 2023 and 2024	
Audit Date	Dec. 12 – 16, 2022

Summary of Voter Registration					Voter Rolls - Total Records (Month Year)
Voter Rolls - Total Records (Dec. 2020)	Name, Address or Other Change	Record Inactivated	Record Canceled	New Records ⁵	
100,000	9,000	3,500	2,000	6,000	100,500

Summary of Audit					
	NCOA - Moved in County	NCOA - Moved out of County	ERIC	Public Health Records	Totals
Records in Stream	6,000	3,000	2,900	1,000	12,900
Records Reviewed	2,000	1,500	1,500	500	5,500
% Reviewed	33.4%	50%	51.7%	50%	42.6%
Valid Action Taken	1,994	1,498	1,498	6,000	5,489
% of Records Reviewed	99.7%	99.9%	99.9%	99.8%	99.8%
Estimate for Total Records	5,982	2,996	2,896	998	12,872
No Action or Improper Update	6	2	2	1	11
% of Records Reviewed	0.3%	0.1%	0.1%	0.2% ⁶	0.2%
Estimate for Records in Stream	18	4	4	2	28

⁵ While new registrations were not a subject of this audit, they are included to show how the new total of voters registered was reached.

⁶ All records of voters identified as deceased were updated by the time of the audit. County death records arrive at the office quickly after a death, but sometimes have missing information preventing match recognition. All such records also showed up in ERIC/Social Security death records, at which point, the voter was canceled. The auditors believe the record should still reflect that county death record was not acted on.

Audit Checklist Template

Individual Voter Record Review	Yes	No
<p>For each selected primary source record, find the corresponding voter registration record and review whether the appropriate action was taken in response to the report.</p>		
<p>Was a notice sent to the voter in response to the primary source report?</p>		
<p>If so, is there a copy of the notice (or type of notice) indicated in the voter record?</p>		
<p>Is there a date for action to be taken if there is no response to the notice?</p>		
<p>Has the voter’s status been changed correctly (active, inactive, canceled)?</p>		
<p>Was the correct status reason entered?</p> <p>Examples include:</p> <ul style="list-style-type: none"> • Canceled - moved out of state; moved out of county • Canceled - deceased • Inactive - NVRA • Active - ID confirmed • Active - reached age of 18 		
<p>Was the correct source entered?</p> <p>Examples include:</p> <ul style="list-style-type: none"> • NCOA report • NVRA report • Department of Vital Statistics report 		
<p>If no action was taken as a result of the primary source document, was there a reason noted in the voter’s record? For example, “no action on NCOA report because voter voluntarily canceled after moving.”</p>		
<p>Did the list maintenance activity comply with:</p> <ul style="list-style-type: none"> • Applicable federal laws • Applicable state laws and regulations • All legal deadlines • Jurisdictional processes and procedures, including checklists and standard operating procedures 		

Audit Reports

Public facing audit reports should be written in plain language and include definitions for any technical terms used. At a minimum, reports should include:

- Date and timeline for the audit
- Who conducted the audit
- Methods used for conducting the audit
- Sample size or number of records or other artifacts reviewed
- Findings, including recommended improvements to procedures

For voter list maintenance audits, this might also include:

- The completed audit checklists or Master Audit Report.
- A summary of findings detailing the percentage of times auditors agreed or disagreed with the original worker.
- Data illustrating the number of voter records updated, added, or removed since the last audit or reporting period.

Election officials should consider working with local media to help the public understand the value of election audits and understand the findings from the audit report.

This guide is part of our Exploring Election Audits series. We welcome feedback and suggested modifications to this guide. Please reach out to support@electionsgroup.com with any comments.



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