

April 27, 2026

# The Elections Group Supports the EAC's Voluntary Standards for Election Audits

On April 27, 2026, The Elections Group submitted the following comment to the Federal Register, supporting the [U.S. Election Assistance Commission's Voluntary National Standards for Election Audits](#).

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## Background

The Elections Group is a team of election experts supporting election professionals through collaboration, thought leadership and effective strategies to elevate best practices. We partner with state and local election jurisdictions as well as nonprofit organizations, looking to implement new programs and improve processes for voters and stakeholders. We share resources, develop solutions and provide direct support.

Our team has done extensive research and collaborated with state and local officials across the country to develop election audit principles and standards.

We grounded this work in systems thinking and practitioner experience. The team used a systems mapping approach to identify funding constraints, policy pressures and operational realities that shape how audits can be implemented. This mapping exercise surfaced key stressors faced by election officials, including limited time, staffing and resources, and informed a central goal: to design audit approaches that are not only effective, but also practical and achievable within real-world election offices.

Building on that foundation, The Elections Group convened and facilitated two multi-day, in-person workshops in 2022 and 2023. Participants were a bipartisan mix of state and local election officials from across the country.

The first workshop focused on understanding how audits could enhance election integrity and public trust. Participants engaged in hands-on exercises, including mapping the full election process from voter registration through postelection activities. They also identified which parts of the election could be audited and explored who should conduct audits, what evidence each would produce and who the intended audiences would be. These discussions were paired with candid conversations about real-world barriers, from staffing and legal constraints to technology and public communication challenges. This ensured the process remained grounded in operational reality.

The second workshop built on those insights, shifting from exploration to the codesign of audit approaches. A new group of election officials validated earlier findings and developed practical

audit frameworks for a narrowed set of priority areas, such as voter registration maintenance, ballot design and ballot reconciliation. Our team guided participants through structured questions about scope, timing, responsibility, sampling and procedures, allowing them to translate abstract ideas into actionable models.

Across both workshops, the process emphasized iterative learning, consensus-building and cross-jurisdiction collaboration. Despite differences in state laws, technologies and local contexts, election officials identified shared priorities and workable approaches to auditing.

Participants reached consensus that creating standards applicable to a wide variety of election audits can ease the burden of implementation, improve public understanding and provide a framework for election administrators to build on best practices from their colleagues and industry leaders.

Standards were needed for:

- Defining an audit's purpose and scope
- Determining how to handle discrepancies
- Determining appropriate evidence
- Determining when an audit should take place
- Determining a sufficient sample size

With participant feedback as well as our own research, we identified the following consensus principles for the conduct of a broad range of election audits:

- **Ethical conduct:** Audits must be conducted with integrity and fairness.
- **Independence:** Auditors must maintain an appropriate level of independence from the subject of the audit to ensure objectivity.
- **Timeliness:** Audits should be performed and completed within a reasonable and clearly defined time frame.
- **Evidence-based standards:** Robust and consistent standards must guide the collection and review of evidence.
- **Clear objectives:** The purpose and goals of the audit must be clearly defined from the outset.
- **Transparency and reporting:** The audit process should be open, with publicly available reporting being highly desirable.
- **Protection of voter privacy:** The confidentiality of voter information is essential.

This work culminated in the publication of nine standards for conducting election tabulation\* audits:

- **Designation of audited contests:** To ensure comprehensiveness and objectivity
- **Ballot accounting and reconciliation:** To ensure accuracy and transparency
- **Public random draws of audit units:** To ensure inclusivity and objectiveness
- **Comprehensiveness:** To ensure broad inclusivity of the audit pool
- **Physical examination of the ballots:** To ensure reliability of the evidence used in the audit
- **Independent auditors:** To ensure objectivity and transparency
- **Voter privacy:** To preserve and ensure voter confidentiality
- **Timing:** To ensure accuracy before certification
- **Reporting:** To ensure transparency and accessibility

\* *Tabulation audits are the most common type of audit in practice.*

# Statement of Support

The EAC's proposed Voluntary National Standards for Election Audits align in numerous ways with The Elections Group's audit principles and audit standards, developed in 2023 by bipartisan election officials from state and local jurisdictions across the country.

**Authorization: Audits should be conducted at the direction of the chief election official at the state or local level, and authorized in law or regulation where possible.**

Based on our research, we know that frequent changes to election laws and regulations make it difficult for election officials to maintain audit procedures. And the entire elections community knows that election laws and regulations differ from state to state. Differences in technology, data format, documentation, forms and practices from within a state can make the process of conducting statewide audits difficult. While most states explicitly authorize audits in statute, establishing a statewide baseline, detailed requirements vary significantly from state to state.

We support clarity regarding authorization in law or regulations for consistency and transparent election audit processes.

**Ethics: Auditors should follow documented ethical principles throughout their work.**

During our audit workshops, participants agreed that the ethical principles of public interest, integrity, objectivity, professional behavior and proper use of government information, resources and positions should guide those conducting election audits. This led to our ethical conduct principle to conduct audits with integrity and fairness.

Auditors should avoid actions that could diminish public trust. Auditors demonstrate integrity when their methods and actions adhere to stated principles, when their actions are predictable. Auditors show objectivity when they are free of conflicts of interest and act with an attitude of impartiality. Auditors must hold themselves to the highest standards for professional behavior, complying with audit regulations and avoiding actions that could prompt someone to question the quality and accuracy of their work. Auditors should only use government information, resources and position for the explicit purpose of conducting the audit, never for personal or political gain or in a way that compromises election security or voter privacy or trust.

We support standardizing ethical principles to earn and boost public trust, and to ensure objective election audit processes.

**Funding: Audits should be adequately funded by applicable public resources.**

We have heard from election officials across the country. All agree they need increased and more reliable funding to support election administration. In some states, election officials are stretched thin when it comes to money, people and time for conducting audits, particularly with the public and political demand for fast, final, certified results. Our research showed that policymakers and budget decision-makers do not always have an adequate understanding of election processes, including audits and what is required to run them effectively.

We support standardizing adequate public funding for election audits.

**Impartiality: Audits must be conducted without bias, prejudice, or undue influence and instead focus solely on factual evidence to reach fair and objective conclusions.**

At the conclusion of our workshops, participants discussed how each type of election audit shares the same characteristics: They need to be accurate, ethical, transparent, bipartisan, timely, unbiased, verifiable, trustworthy and comprehensible. Despite external pressures aimed at influencing audit outcomes, audits and auditors must be impartial to engender credibility in the audit and public confidence. Even the perception of bias, prejudice or undue influence could stir doubt about the integrity of election audit processes.

The Elections Group's tabulation audit standards support a physical examination of the paper ballots to ensure the reliability of the evidence used in the audit.

Our principles of evidence-based standards, auditor independence to ensure objectivity and clear objectives defining the goal and purpose of the audit align with this proposed standard.

We support a standard requiring impartiality.

**Independence: Auditors should maintain a degree of independence from the work being audited, and neither the audit process nor results should depend solely on the chief election official.**

Under TEG's independence audit principle and independent auditors standard, auditors must maintain an appropriate level of independence from the subject of the audit to ensure objectivity. This is true whether they are election office staff different from those who conducted the election, authorized external auditors, trained volunteers or a board established to conduct audits. While different funding levels, staffing capacities and regulatory frameworks will affect who conducts the audit, auditors should not audit their own work, and standards can help them achieve and demonstrate independence. Auditors need to avoid situations that could give the impression they are not independent and therefore not capable of exercising objective and impartial judgment.

We support a standard for independence, so auditors are not auditing their own work.

**Competence: The audit team should collectively possess the necessary knowledge, skills, and experience to conduct an audit effectively and in compliance with professional standards, legal requirements, and the specific context of the election.**

Elections and election audits are complex. Navigating the relevant laws, regulations and best practices requires certain knowledge and skills, which auditors can obtain through training. While conducting our audit workshops, the topic of establishing a credentialing process or a training program to help auditors gain the information needed to understand the election processes they are auditing surfaced. Awareness that auditors are professionals trained or credentialed to conduct impartial, compliant election audits would enhance public confidence in elections and audit processes.

We support a standard to ensure auditors have the knowledge, skills and experience to conduct effective, compliant audits.

**Standardization: Audits should be a standardized part of the election process that can be planned for in the regular course of election preparation.**

The Elections Group is a major proponent of comprehensive checklists and detailed standard operating procedures to ensure election processes are carried out as intended and in compliance with laws, regulations and best practices. We also support standardizing audits of more than the vote count. Indeed, we make checklists available to help election offices conduct ballot management, list maintenance and signature verification audits.

In 2024, we collaborated with academic researchers on a large-scale study of election audit communications. We wanted to see what approach increased confidence in the accuracy and integrity of the vote among American voters. Each study participant viewed three one-page audit summary visuals and a control. The most effective visual was the one that focused on the process of the audit. The least effective was the visual focused on the results of the audit although it still brought a statistically and substantively significant impact on trust.

TEG's audit standards support broad inclusivity of the audit pool, designation of audited contests for a balanced review and public random draws of audit units to ensure objectiveness. While TEG's standards introduce some variety into the audit for balance and inclusivity, they are nonetheless part of a standard process in many jurisdictions. Making audits a standard part of the election process would not diminish their feasibility or value.

We support including audits as a standardized part of the election process.

**Appropriateness: The scope, evidence, and methods of the audit should be clearly defined and correspond to the goals of the audit.**

In our audit workshops, election officials agreed that an election audit should be planned and conducted with clearly defined outcomes. Auditors should clearly define what an audit validates. In addition, TEG's audit principle of clear objectives supports defining the purpose and goals of the audit at the outset.

Officials should clearly explain why they have chosen a particular scope, specific evidence and methodology for an audit. They need to describe why this approach is relevant and how it meets the audit's objectives. For example, a postelection tabulation audit of the results might have the scope of a single election with a sample size of individual precincts, a clearly defined objective of verifying that reported machine counts match the audit counts of the same ballots and a physical hand-count methodology.

We support clearly defining an audit's scope, evidence and methods as they correspond to the goals of the audit.

**Efficacy: Audits should be conducted with a clear purpose in mind, be completed in time for the results to be useful, and include a plan for analyzing and utilizing the results and/or data gathered during the audit.**

This standard is critically important. If the purpose of the postelection tabulation audit is to validate the results of the election, it should be completed before the election results are certified. The Elections Group's timeliness audit principle supports audits performed and completed within a reasonable and clearly defined time frame. Our timing standard, developed by election officials from across the country, states that audits intended to validate the accuracy of the results should take place before certification for the audit results to be useful. Audits of election results conducted after certification must have some other purpose to be useful.

Should state laws and regulations require timing that does not support the use of the results for the intended purpose, such as tabulation audits to check accuracy conducted after results are certified, we encourage election officials and voters to advocate for pre-certification audits.

We strongly support a standard for audits timed to ensure the results are useful for their intended purpose.

### **Flexibility: Audit processes must include ways to identify and respond to unexpected challenges or constraints.**

Election officials anticipate unexpected challenges and constraints. They have standard operating procedures and contingency plans for other election processes, and it only makes sense to conduct audits using the same approach. Even if auditors never need to use them, having documented plans ready to address the unexpected is essential to conducting successful audits. Documenting any adjustments and the reasons for them is critical for trust, transparency and accountability.

We support a standard that allows for audit process adjustments necessary to uphold the original intent of an audit.

### **Privacy/Confidentiality: Confidential data and voter privacy should be protected in accordance with applicable laws and regulations. Where these constraints limit public disclosure, they should be explained.**

For 135 years, every state has guaranteed voter privacy with provisions for a secret ballot, and today, states have laws requiring the protection of sensitive voter information, often going beyond federal law, placing additional safeguards on using this information. These requirements apply to all election processes, including audits.

During our audit workshops, election officials acknowledged that election audits should be designed to protect voter privacy and to reveal to auditors only what is necessary to meet the audit objectives. Our protection of voter privacy audit principle states that the confidentiality of voter information is essential. Our voter privacy audit standard supports preserving and ensuring voter confidentiality.

Our audit workshop participants identified two approaches to help maintain voter privacy: Auditors should be sworn in, and oaths should include a statement of non-disclosure for specified protected information. And election audit processes should be designed to permit only necessary access to protected information. Where there are public observers, there should be a defined process to request redacted versions of private evidence, which may include deferring such requests to the open records request policy.

We strongly support an audit standard to protect confidential data and voter privacy.

**Security: Audits should follow established security best practices and be conducted with trusted technology and personnel. Nothing done in the course of the audit should prevent election officials from using audited equipment, ballots, or other records for their intended election purpose.**

Chain of custody does not end when the audit begins. Ballots, election records and equipment must be secured to prevent interference, destruction and loss throughout the audit. Audit procedures should be designed with security best practices in mind to ensure ballots, records and equipment remain secure even if safeguarding methods vary.

We support a standard to use trusted technology and personnel and follow security best practices throughout the audit to safeguard ballots, records and equipment.

**Public Communication: Election officials should communicate with the public about the goal(s), process, and outcome of the audit to promote public confidence.**

When The Elections Group collaborated with academic researchers on a large-scale study of election audit communications in 2024, we learned that the most effective communication for increasing election confidence was the one that focused on the process of the audit. The least effective was the visual focused on the results of the audit although it still brought a statistically and substantively significant impact on trust. A single page using a clear, infographic style and listing the basic steps of the audit process increased voter confidence in the election.

In addition to providing public notice of an audit before it takes place and encouraging public observation with explanatory handouts, The Elections Group urges election officials to publish timely, plain language, accessible audit reports to support election accuracy and trust.

Certain audit procedures are complex and may be difficult to explain to non-election audiences, but this work is essential for transparency, accessibility and understanding. It may also help with funding. If election officials can better communicate audit processes and results to the voters and policymakers, they may be better equipped to explain why additional funding is necessary and how it would help improve election administration.

This proposed standard aligns with our reporting standard to ensure transparency and accessibility.

We applaud and vigorously support a standard that promotes timely, plain language, accessible, publicly available communications about audits to boost election confidence.

**Transparency: The goals, methods/procedures, and results of the audit should be clearly documented and publicly accessible, consistent with applicable law and regulation. Public observation of the audit process is desirable but must not interfere. Where constraints are present, they should be explained.**

Transparency is fundamental to engendering trust in election processes. The Elections Group's transparency and reporting audit standard promotes an open audit process with publicly available reporting.

To do this well, officials must consider transparency during the planning phase of an audit. If observation is permitted, auditors should determine how best to designate a viewing space or provide for the livestreaming of the event. They should consider whether and how observers can interact with auditors. They should consider how to give adequate notice of events and how to help observers understand what they are viewing, being mindful that observation without information on the process and livestreams without audio or captions are difficult to follow.

During our audit workshops, election officials from across the country supported transparent audits as a means of informing the public about the conduct of elections. They discussed accomplishing this by encouraging public observation and publicly available reports of audit processes, findings and recommendations. They offered ways of supporting transparency: Give timely notice of audits open to public observation and hold them in buildings accessible to the public. Prepare simple written materials or a short presentation explaining the audit process to observers. Use plain language in audit reports and post them on a public-facing website within a predetermined time frame following the audit.

Election officials and auditors should be able to provide accessible and meaningful observation and reporting for the public as a standard. When direct observation is not practicable or creates privacy challenges, for example in a list maintenance audit, auditors must determine how to transparently report their findings while protecting voter privacy.

We support clear documentation and public access to information about the audit's goal, process and results, encourage public observation that maintains security and voter privacy, and recommend using communications to explain the audit process to observers.

## **Conclusion**

The Elections Group supports the proposed standards.

*Original link: <https://electionsgroup.com/support-for-voluntary-election-audit-standards/>*