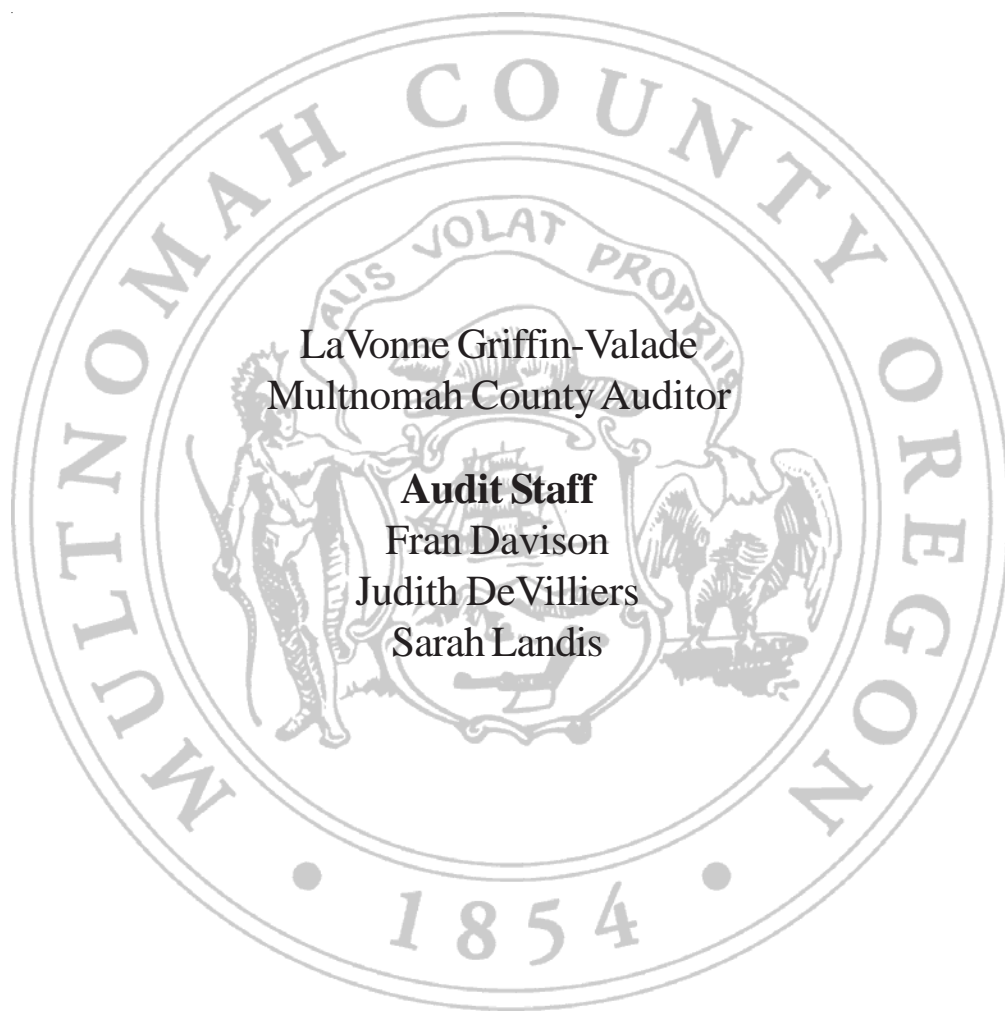


## Elections Audit

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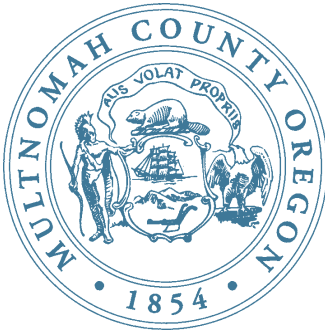
June 2007



LaVonne Griffin-Valade  
Multnomah County Auditor

**Audit Staff**

Fran Davison  
Judith DeVilliers  
Sarah Landis



# LaVonne Griffin-Valade

## Multnomah County Auditor

501 SE Hawthorne Room 601  
Portland, Oregon 97214  
Phone: (503) 988-3320

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### MEMORANDUM

Date: June 27, 2007

To: Ted Wheeler, Multnomah County Chair  
Maria Rojo de Steffey, Commissioner, District 1  
Jeff Cogen, Commissioner, District 2  
Lisa Naito, Commissioner, District 3  
Lonnie Roberts, Commissioner, District 4

From: LaVonne Griffin-Valade, County Auditor

Subject: Elections Office Audit

The attached report covers our audit of the Multnomah County Elections Office, a division of the Department of Community Services. This audit focused on observation of the November 2006 General Election. The objective of the audit was to determine whether the Elections Office has the controls in place to ensure an accurate, fair, and efficient election.

We found that Elections Office employees are dedicated and hardworking and that they successfully managed the many complex processes involved in preparing for and carrying out an election. While we did identify some areas for improvement, it is our overarching conclusion that Multnomah County voters can be confident that the Elections Office conducts elections fairly and accurately.

The Elections Office was extraordinarily responsive to any concerns we raised during the audit and has already implemented or taken steps to implement a number of the recommendations we put forward. We were also impressed with openness of Elections Office staff and the accommodation shown to us throughout the busy General Election season.

We will conduct a formal follow-up of this audit during the 2008 General Election to determine the progress made in implementing recommendations.

We would like to acknowledge and thank the management and staff of the Elections Office and the Department of Community Services for the cooperation and assistance extended to us during the audit.

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# Introduction

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## Audit Summary

The primary conclusion of this audit is that the Multnomah County Elections Office (Elections) administers its work effectively and that the public should have confidence in its ability to conduct elections fairly and accurately. Elections must balance three primary and sometimes conflicting purposes in its management of elections: ensuring that elections are secure and accurate, providing convenience and high quality services to voters, and controlling costs. The audit makes recommendations for some shifts in this balance, while also recognizing those areas where Elections is strong. The recommendations also focus on ways to document the practices that are already in place and ensure that the experience and knowledge of staff can be passed on. Elections has already worked to implement a number of the recommendations made in this report.

The objective of the audit was to determine, through observation and testing, whether Elections has the proper controls in place to ensure an accurate, fair, and efficient election. A high quality and transparent system for elections is essential for democracy to thrive and for citizens to have faith in their government. Given the high profile concerns about the accuracy and fairness of elections in the United States in recent years and because of their critical importance, we decided to initiate a performance audit of Elections and closely observe the November 2006 General Election. While we identified some areas for improvement, we found that Elections and its employees conducted the election with honesty and integrity and made strong efforts to ensure that every vote was accurately counted. We were impressed by the ability of Elections to successfully manage all of the complex processes involved in preparing for and conducting an election.

## Background

Elections, a division within Multnomah County's Department of Community Services, provides a vital service to the community in its conduct of all county, state, and federal elections within Multnomah County as well as elections for local races, such as city governments, school boards, special districts, and ballot measures. Oregon has four regularly scheduled elections every year, all of which are vote-by-mail.

Conducting an election is a long, detailed, and heavily regulated process that begins months before its culmination on Election Day. Activities include: registering people to vote and maintaining an accurate voter database; verifying signatures for candidate and initiative petitions; accepting filings for candidates and measures; producing voters' pamphlets; preparing and mailing ballots; managing drop site locations; assisting voters with special needs; processing returned ballots; verifying voter signatures on return ballots; tallying votes; releasing results; and certifying the election.

### *Budget and Staffing*

Since the implementation of vote-by-mail in 2000, expenditures on elections have been generally higher during presidential election years. In Fiscal Year 2006 (FY06), the most current year for which complete fiscal information is available, total Elections expenditures were \$2.5 million.\* The Elections Office had outside revenues of \$348,321, just over half of which were from billing other jurisdictions for elections costs. Of the \$2.5 million, 47% was for staffing and approximately 30% was for contract services, materials, and supplies such as ballot printing and postage.

Elections has a budgeted staff of 15 regular, full-time employees plus up to several hundred temporary workers who are employed before and during an election to assist with signature verification, picking up ballots from drop boxes, opening and processing ballots, and assisting voters who need help with marking and casting their ballots. The Elections Director oversees the division and two other managers supervise separate groups of employees. Permanent staffing levels have remained stable over the last 10 years.

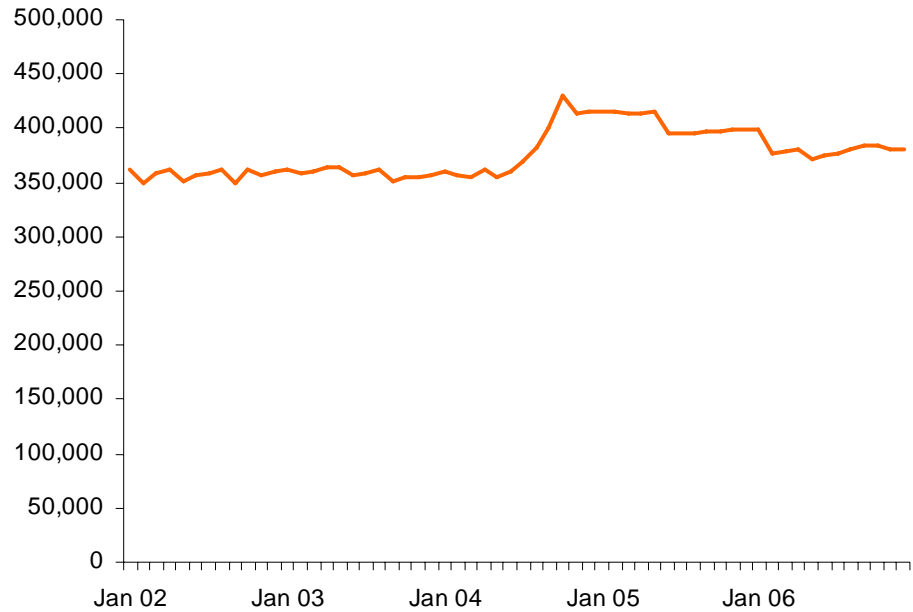
### *Trends*

While monthly figures vary, there has been a slight upward trend overall in the number of people registered to vote in Multnomah County over the past five years: the average annual number of registered voters was 6.5% greater in 2006 than in 2002. The increase in voter registration numbers in mid-to-late 2004 shown in the following chart coincides with the last presidential election.

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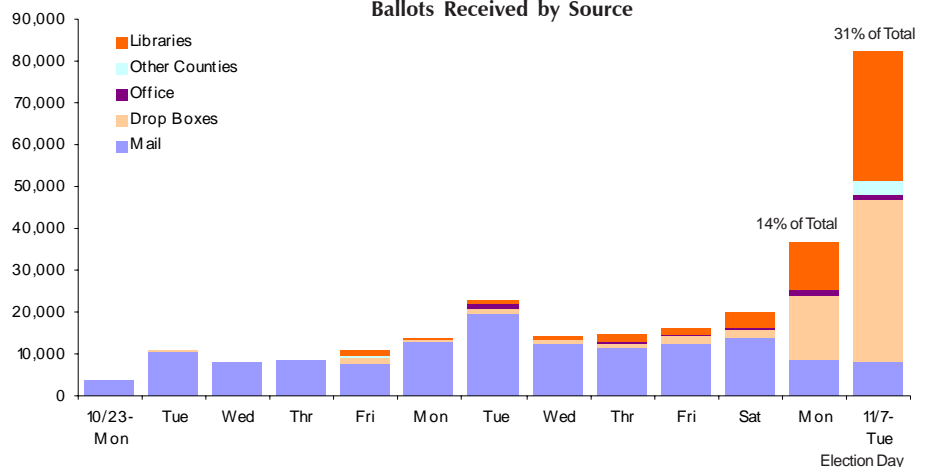
\*FY06 figures do not include expenditures for the November 2006 General Election, the subject of this audit, because it occurred in FY07 (July 2006 – June 2007.)

**Multnomah County  
5-Year Monthly Voter Registration**



Elections' workload varies markedly from election to election, depending on the number of contests and precincts affected. The size of the ballot (number of contests and candidates), voter turn out, and the timing of when voters return their ballots also affect the amount of work Elections must do to prepare and process ballots. As shown in the chart below, for the 2006 General Election, 45% of those ballots returned came in on the day before or day of the election, increasing the amount of processing to be accomplished in a short amount of time.

**Multnomah County  
2006 General Election  
Ballots Received by Source**



## **Scope and Methodology**

This audit focused on observation of the November 2006 General Election using relevant best practices and Oregon laws and regulations as criteria. We conducted audit work in three primary areas: serving voters, preparing for the election, and counting the votes. We assessed the effectiveness of Elections' current internal controls over its processes, limiting the audit to the elections system in its current state. We did not review alternatives to current state law, equipment, or required procedures, nor did we conduct detailed staffing or cost analyses.

All of the major processes and events of the election were included in our observations. Except for one-time events, we conducted our observations on a number of days and times in order to get a representative view of controls and activities. We also gained information from many formal and impromptu interviews with staff. We observed activities close up and were not restricted to the public areas for regular observers. We are grateful to Elections for allowing us to sit with staff members, closely observe their activities, and ask them questions as they worked. In addition to direct observation, we did research, reviewed documents, and analyzed and tested systems and data for the election. See the Appendix for details.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## **Additional Reports**

In addition to this general report, we also provided management with a detailed technical audit report. This allowed us to communicate our observations about specific processes to management without the level of explanation and background that would be necessary in a report intended for a general audience. All important findings and recommendations are included in this general report. We also produced two interim reports to management prior to the election covering our early review of tally machine programming and testing, public observation, and building security.

## Audit Results: Serving Voters

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In this Section:

1. Voter Registration
2. Front Counter Assistance
3. Ballot Reception
4. Voter Assistance Team
5. Public Observation



In order to maintain public confidence in the integrity and quality of an election, it is important to make sure voters have a good experience when making contact with the Elections Office. There are a number of situations in which Elections provides direct services to voters, including accepting and processing voter registrations and updates, supplying places for people to vote and drop off their ballots, accommodating those who wish to observe the election process, and providing assistance to those who need help casting their ballots. We found that Elections displayed a commitment to providing high quality voter services.

We observed activities and processes involved in voter registration, ballot reception, voter assistance, front counter service, and opportunities for public observation. While staff were proactive in meeting voters' needs, conscientious about accuracy, and open to observation, we also found that improvements are needed in better matching staffing to workload, providing written guidelines and training for staff, and managing the volume of voters and ballots on Election Day and the day before.



## 1. Voter Registration

Registering to vote requires filling out a registration card and, for those registering for the first time in Oregon, providing identification. Once Elections receives a voter registration card, workers enter the information into the statewide voter registration database (Oregon Central Voter Registration – OCVR) and scan an image of the voter’s signature from the card. This work is conducted by permanent Elections staff for most of the year, with assistance from temporary employees as workload increases around election time. Additionally, Elections must accurately maintain Multnomah County’s OCVR entries; provide customer service; help voters make arrangement for absentee, overseas, and military ballot reception; and resolve various registration issues as they arise.

*Findings* We observed that voter registration activities were strong and that good customer service was provided. In addition, Elections has effective voter file maintenance practices, including regular mailing of voter notification and confirmation cards to ensure voter information is correct, a process in place to handle problem registrations, and a knowledgeable permanent staff who work to ensure that eligible voters can vote with a minimum of difficulty. We also found a high degree of accuracy in the voter file after conducting a sample test of registered active and inactive voters.

Elections could improve its operations by providing uniform, organized, and easily accessible procedures to workers to guide their voter registration tasks and interactions with voters. This is particularly important during the rush of an election when temporary staffing increases. **See Recommendation I.**

## 2. Front Counter

Voters came in to the Elections Office for a variety of reasons during the election, most frequently to request replacement ballots and clear up registration issues. They also came in to mark their ballots at portable cardboard voting booths arranged along one side of the building or in the space provided upstairs. The front counter in the Elections Office became very busy as Election Day grew nearer.

*Findings* The space available for people to wait in line is small and must be used for multiple purposes: waiting for service, picking up a replacement ballot, voting, checking in through security to gain access to the main office, and other through traffic of those coming and going from the building. Given the physical limitations of the building itself and, in

particular, the small space available in front of the counter for voters to wait in line, we found that Elections did a good job of managing the line and providing service.

Most of the workers performing counter and telephone service during an election are temporary staff who work only during election periods and therefore do not have the benefit of daily experience to guide their interactions with voters. This increases the risk of inconsistency and error. Front counter work is an area that demands a strong knowledge of the subject area, and one in which work processes must frequently adjust to accommodate changes in the workflow. To improve service, we recommend that Elections enhance and organize existing written procedures for front counter and phone workers. Training should also reinforce these procedures. In addition, we recommend cross-training and task rotation to provide better coverage and avoid workers having to spend long hours on their feet. **See Recommendations I and II.**

### 3. Ballot Reception

Voters may return their completed ballots to the Elections Office through the mail, at any official drop box in the state, at the Elections Office, or at any of the 24 drop box containers in Multnomah County, including each library location. For the 2006 General Election, 44% of ballots returned were left at drop sites. Elections has a responsibility to ensure that ballot receptacles are secure and emptied before they become full and that voters experience a minimum of wait and frustration while casting their ballots. Elections must balance these responsibilities with the need to control costs and to ensure that convenience does not compromise the security of ballot drop sites or the safety of workers.

*Findings* We observed that Elections worked to provide adequate and convenient opportunities for voters to return their ballots. With 24 drop boxes, Elections substantially exceeded the minimum state requirement of 13-14 drop boxes by making effective use of County libraries as ballot drop sites. In addition, they worked well with the Library and US Postal Service to ensure a smooth process for collecting ballots throughout the election. This collaboration is ongoing and changes are made to improve services following each election.

Elections staff members picked up the mail from the post office every morning during the election and as needed from the drive-up drop sites and libraries until the weekend before Election Day, when the frequency of pick ups increased. Ballot boxes were locked at their sites and during transport and remained locked until they were delivered to

the Elections Office. This process generally worked well, although written and verbally reinforced procedures for runners would help to ensure consistency of expectations and practice. **See Recommendation I.**

Many Multnomah County voters, like those across the state, waited until the last two days to take their ballots to a drop site. This last minute surge created some problems with a few ballot containers being full. Elections is working to address the problem of full containers by providing back up boxes to libraries and adding a second team of runners to pick up ballot boxes on some routes.

Traffic in front of the Elections Office was frequently congested, particularly on Election Day and the day before. Even with Sheriff's deputies assigned to direct traffic, the intersection was dangerous for pedestrians and the wait to drop off ballots was long. To remedy the situation, we recommend that Elections actively monitor traffic and the work of those providing traffic control; provide explicit written instructions and secure formal agreements about expectations for traffic control and the 8:00 p.m. cut-off for accepting ballots; consider allowing Elections staff to take ballots from people in cars, if they can safely do so; and continue to explore options for installing a ballot drop box on Belmont Street to relieve the congestion that occurs when people must turn onto 11<sup>th</sup> Avenue to drop off their ballots. **See Recommendation VII.**

#### **4. Voter Assistance Team**

The Voter Assistance Team (VAT) is comprised of temporary Elections workers who provide help with voting to the elderly, people with disabilities, and those with language translation needs or other potential barriers to voting. Teams are comprised of two members of different political parties who help voters by reading information from voters' guides, physically marking ballots as directed by the voters, and updating their registrations. Services are provided either in the Elections Office or at a location of the voter's choice.

The VAT began during the 2004 General Election and has grown considerably in size and scope since then. For the 2006 General Election, VAT staff expanded their services to proactively seek out voters who may need assistance at care facilities and hospitals throughout the county. In addition, Elections began a new voter registration project aimed at seniors and people with disabilities, arranging registration drives at libraries, senior centers, and care facilities. Management estimates serving 665 voters under this program. Elections reports that these expanded efforts were a response to Oregon's plan to implement the federal Help America Vote Act of 2002.

For the voting assistance phase, Elections estimated that they served 223 voters in-person during the 2006 General Election, with an additional 325 instances of assistance by phone. They report serving 120 voters in-person during the 2004 General Election. Statistics for phone service in 2004 were not available. Elections reports indicate that this growth in activity led to increased staffing for the VAT, from 12 temporary employees for the 2004 General Election to 32 employees for the 2006 General Election. Comparable records of all expenditures were not available for 2004, although expenditures on wages for the VAT were more than seven times higher for 2006.

*Findings* Elections demonstrated a commitment to ensuring that disability of any kind would not prevent a voter from casting a ballot. They worked to engage community partners, such as Elders in Action, the League of Women Voters, Multnomah County Library, and Loaves and Fishes. Because of their efforts, at least 223 voters who might otherwise have encountered difficulty with voting received assistance. Elections is recognized as a leader in the state for its efforts in this area.

We found that the scale of the assistance portion of the VAT's work was larger than necessary to cover requests for services, resulting in overstaffing and inefficiencies. VAT members who were not out on calls were idle for large portions of the day, in contrast to the otherwise very busy environment in the office. Expenditures on wages for staff that were not needed represent a missed opportunity for savings or for necessary expenditures in other areas of work. We recommend that Elections scale back the size of the VAT team and cross-train team members to fill in on other important elections tasks. **See Recommendations II and VI.**

Additionally, we have concerns about the expansion of the VAT's activities without additional policy direction, planning, and budgeting. Increased activities have the potential to significantly impact Elections' workload without additional funding to offset growing expenditures. We recommend that Elections avoid drawing resources away from other critical areas of elections work by seeking funding and policy direction via a formal program offer or dedicated portion of the base budget request. **See Recommendation VI.**

## 5. Public Observation

The transparency and openness of public elections help ensure that they are fairly and accurately administered. By understanding how elections work and observing the various processes as they occur, interested citizens gain confidence in both the process and the results of the election. Oregon law permits public observation of the “receiving and counting of votes” (ORS 254.482).

*Findings* Elections meets both the letter and the spirit of this law by allowing any interested individual or party to observe operations during an election in specially designated observer areas. During the 2006 General Election, 157 observers came through the office. Beyond merely allowing observers, Elections made concerted efforts to educate the public about their activities and was responsive to information requests. Following our suggestion, Elections has posted information sheets at each observer station to help answer some observers’ questions.

While Elections is open to public observation, it must also keep ballots and equipment secure, maintain voter confidentiality, provide a safe and comfortable environment for employees, and keep the overall security of the building intact. Elections employed strong techniques for monitoring observers, limiting their access to specific observer areas, and requiring sign in and a quick security screening. At the same time, Elections accommodated all observers and was responsive to requests for information and a request for additional testing, wherein the printed tally results from each tally machine on Election Day night were compared to the numbers generated by the computer compiler.

We had no formal recommendations for improvement in this area.

## Audit Results: Preparing for the Election

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In this Section:

6. Ballot Preparation
7. Computer Security and Tally Machine Programming and Testing
8. Building Security



The steps involved in preparing for an election are complex and begin long before the election is held. Elections staff must receive all relevant information from candidates and jurisdictions to prepare the voters' pamphlet and create the ballots; program and arrange for printing of ballots; manage a system to serve overseas, absentee, and military voters; program and test vote tallying equipment; prepare a file with all eligible voters who will receive ballots; coordinate the process of addressing, inserting, and mailing ballots; and oversee multiple vendor-provided services. In addition, Elections must ensure that there is adequate physical security for the ballot drop boxes, building, tally machines, and related computer equipment.

We found that Elections does a good job of preparing for elections, particularly in maintaining the integrity of the various processes involved, adhering to timelines, and ensuring accuracy. They also demonstrated a commitment to security and were continuously making adjustments throughout the course of this audit. Improvements in documentation of policies and procedures would reduce the risk of losing critical knowledge and skills, increase consistency, and promote accountability.

## 6. Ballot Preparation

Beginning in the months prior to an election, the Elections Office prepares the physical building, equipment, voter registration database, and ballots for the election. This work must be done accurately and in a timely fashion to ensure that each phase of the election progresses to the next without delays or problems. The cost of an inaccurate ballot or flawed process for preparing and mailing the ballots to voters would be large, both in terms of dollars and public confidence. In addition, Elections must look after the physical security of ballots at each phase and location to ensure the integrity of the election.

*Findings* We found that Elections staff members are knowledgeable, competent, and innovative in their work. In particular, we noted the following strengths:

- Strong quality control processes are employed at the mail house vendor's location where envelopes are addressed, ballots and other pieces of information are inserted into envelopes, and ballots are picked up by the post office for delivery. Elections carefully and thoroughly oversees the work conducted there.
- Preliminary tests of the tally machines prior to public tests were a strong control over ballot programming quality. These tests, which used a test deck of ballots prepared by elections workers, are designed to detect and correct any errors in Elections' programming of the tally machines.

The effectiveness of Election's operations is largely attributable to the knowledge and experience key staff members bring to their work. While this has benefited Elections, it could also prove to be a liability in the event of a vacancy, retirement, or unexpected absence. Elections has cross-trained some staff in important areas, but we believe it should do more to ensure not only that staff are trained to step in, but that there is true skill redundancy. This can be achieved within current staffing levels by identifying the most mission critical functions, i.e. those whose failure would compromise the quality or workflow of an election, and ensuring that there is skill redundancy among staff members. **See**

### **Recommendation II.**

We found that Elections could improve its documentation of the following:

- Best practices recommend clear description of the procedures used to program and issue ballots and define and maintain precinct boundaries in order to ensure transparency and accountability. Documentation of these processes should be included in the policies and procedures manual recommended in various places throughout this audit report. **See Recommendation I.**



- Although the chain of custody of unvoted ballots with vendors is described in various Elections documents, there is no physical audit trail produced. Every time custody of ballots changes hands there should be documentation that the hand off occurred, when, and to whom. **See Recommendation III.**

## 7. Computer Security and Tally Machine Programming and Testing

Security and testing of the ballot tally machines, software, and programming used to count votes are essential to ensuring the accuracy of the election. Prior to an election, candidates' positions on the ballot are programmed into the tally machines. To ensure the accuracy of the programming, each of the tally machines is checked using what is called "logic and accuracy" testing. During this process, Elections creates a test deck by marking ballots for each precinct and race using a predetermined marking pattern. Elections then tallies the test deck and compares the actual results to the expected results to identify any problems with the test deck, equipment, or programming.

Elections conducts an extensive internal test for all machines, precincts, and contests first. After this is complete, three public tests are held: the first occurs a week before the election, the second is on Election Day, and the final test is after the election but before the results are certified. The public tests use a selection of precincts on all machines. The totals for each machine are accumulated and summed using Unity Software on a stand alone computer. This year, Elections also tested the computer that compiles the final results.

*Findings* Elections demonstrated a strong commitment to equipment and procedural security. In particular, we noted that:

- The computer and tally machine are in a secure, locked room with limited access.
- The backup server is also secure.
- All tally equipment (server, computer, and tally machines) is stand-alone.
- The computer's operating system allows for good security and password protection.
- Software and tally machines are certified by the Oregon Secretary of State's Elections Division.

Elections also effectively administered logic and accuracy testing of the tallying equipment. Programming is done in-house, which is a good control over accuracy and security. During public testing, Elections allowed as many observers as was feasible to witness the tests.



Additionally, at the request of an observer, Elections expanded the testing to include a comparison of printed totals from each tally machine to the compiled totals from the computer. Finally, they were responsive to our interim report on tally system programming and implemented several additional controls for this process, such as keeping the sealed public certification results in the custody of someone other than the individual who runs the test.

Elections was also responsive to our recommendation to segregate the duties of programming the tally machines from designing and running the tests. After observing the election, however, we believe that we originally misidentified the control risk. The potential for risk to security lies mainly between programming and design of the tests, rather than between programming and running the tests. To align with best practices, we recommend that Elections create a distinct barrier between the duties of the person responsible for programming and those of the person designing the test deck and giving instructions to the workers marking the test decks. **See Recommendation IV.**

The logic and accuracy testing process could be improved by having a unique number of ballots marked for each position on the ballot.\* Although this could be onerous in contests with a large number of candidates, a marking system that gave each candidate a different number of votes would provide greater assurance about accuracy and added confidence for interested observers in the rigor of the tally machine and computer testing process. We believe that this additional step for the public tests would not entail much additional cost.

## 8. Building Security

Security of the building in which ballots are stored, processed, and counted is an important part of ensuring that elections are adequately safeguarded from intentional tampering or unintentional mishandling. Security responsibilities range from developing adequate alarm and key systems, to preparing for natural or other disasters, to configuring appropriately secure work areas. There have been no known breaches of building security that could have posed a risk to an election in memory.

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\* In current practice, there is potential for more than one candidate in a given race to receive the same number of votes as another during testing. This does not ensure that each position on the ballot is tested with a unique number of votes cast. For example, the design used for the 2006 General Election was a 1, 2, 1, 2, 1 system for marking ballots. Using this pattern, a contest with five candidates would have three candidates who received one vote each and two candidates who received two votes each (Candidate A received 1 vote, B received 2 votes, C received 1 vote, D received 2 votes, E received 1 vote.)

*Findings* Elections has a number of strong security features in place, including use of a building large enough to accommodate all aspects of processing voted ballots; quick logging in of ballots and verification of signatures; and multiple safeguards such as lock and key systems and alarms. We found Elections staff to be knowledgeable and deliberate about building security, and noted that they were continuously working to improve. We issued an interim report on building security in mid-October 2006. During the election, we followed up on Election's progress on implementing the recommendations from that report and found that they had worked to address our suggestions, including better controls over key card access.

Recent remodeling has increased security considerably with the addition of a key card operated elevator and more electronic door locks. Although there are plans to improve security further, some of these improvements are a few years away and would require additional capital investments by the County. Specifically, the following security-related issues should be addressed:

- The office supply closet is currently located in the back of the room in which the tally machines are located. To reduce the number of people who enter this highly secure area, a separate entrance should be built to the supply closet or the supplies should be moved to another location. **See Recommendation V.**
- While the overall building has good security, the locks and doors on some of the rooms used to process and store ballots are out of date or inadequate for security. To more fully safeguard the ballots, these should be replaced. **See Recommendation V.**

## Audit Results: Counting the Votes

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In this Section:

- 9. Ballot Log-in and Signature Verification
- 10. Ballot Sorting
- 11. Ballot Opening, Inspection, and Duplication
- 12. Vote Tallying



Once ballots are returned to the Elections Office, the process of counting the votes begins. In the typical process, incoming ballots are logged in to the Oregon Central Voter Registration (OCVR) database by scanning the barcode on the outside signature envelope. The signature on each returned envelope is verified to an image of the voter's signature from his or her registration card. Ballots are then sorted by precinct or put into batches, depending on the pace, turnout, and time point in the election. Next, ballots are moved to the basement area to be opened, separated from their signature and secrecy envelopes, and inspected for tally machine readability by election boards. Ballots are then returned upstairs and run through the tally machines. Tally results from each machine are downloaded into a computer that compiles the running totals. Results are posted to the County's website and distributed in the office to interested parties.

There are a number of instances where variations or exceptions to the above process occur, such as when the precinct sort is suspended or ballots are removed to deal with a problem, such as a missing or wrong signature.

The security of ballots and the integrity of the processes used to count the votes are extremely important. Once the ballots are in the Elections Office, logged in, and the signatures verified, they are considered “voted.” Seven days before the election, staff begin to separate ballots from their signature and secrecy envelopes so that a ballot can no longer be traced back to its voter. This ensures voter confidentiality. Each step of this work must be conducted carefully, accurately, and in a timely fashion to ensure that activities further along in the process go smoothly and that every ballot is counted. We found that Elections generally manages this process well and has a strong commitment to ensuring that every vote gets counted. We found some room for improvement in handling a large volume of last minute returns, ensuring that elections boards conduct their work as directed, and tracking ballots within the building.

## 9. Ballot Log-In and Signature Verification

Each ballot that is returned to Elections, whether by mail or in a drop box, must be logged in and have the signature on the outer envelope checked against an image of the original signature on the voter’s registration card. This step is crucial to ensuring that an election is free of fraud and is an important component of making the vote-by-mail system work.

During the 2006 General Election, over 262,000 ballot return envelopes were logged in to OCVR and verified for a matching signature, creating a master list of returns. Most of this work was conducted by temporary staff. During the process of log-in and signature verification, exceptions such as envelopes with address changes, signatures that did not match the image on file, or that had the wrong signature were identified and set aside for further investigation.

*Findings* Elections has a competent, hard-working, and efficient staff in place for this process, many of whom are temporary workers who return year after year. In particular, we found:

- A high degree of teamwork that helped get large amounts of work done in a short amount of time.
- An experienced and knowledgeable team leader with valuable expertise on handling problem ballots, answering questions, and keeping the workflow moving.
- Effectively cross-trained workers who can perform multiple functions, including signature verification, counter service, data entry of voter registration cards, handling incoming phone calls, running tally machines, and other tasks.

We also found that Elections has effective processes with good controls in place for logging in ballot return envelopes, verifying signatures, and handling exceptions.

However, as the volume of incoming ballots increased in the days immediately preceding the election, work fell behind and was not caught up until a few days after the election. This created a log jam and had a ripple effect throughout the ballot counting process. Staff were very tired by Election Day evening and were many hours away from finishing signature verification, thus increasing the risk for errors associated with fatigue. To remedy this situation, Elections should develop and implement strategies to better manage the volume of last minute returns to prevent a log jam at the ballot log-in and signature verification stage. These strategies should include bringing in additional staff to ensure that they are caught up by Monday before the election, implementing shift work, cross-training additional staff in signature verification, and using productivity measures, such as number of signatures verified per person per hour, to better plan for staffing needs. **See Recommendation II.**

We also found that Elections lacks formal, documented internal procedures for these processes, which could lead to inconsistencies in training, decision-making, and practice. As we have identified elsewhere in this report, Elections' effectiveness could be at risk if key people leave or change positions and we recommend that Elections document basic instructions, expectations, requirements, and frequently asked questions for logging in, signature verification, and exceptions. **See Recommendation I.**

## 10. Ballot Sorting

Sorting and batching ballots, which are still sealed in their return envelopes at this point, as they are delivered to the Elections Office is an important control for accurate processing. Return envelopes are first inspected and batched for entry into the OCVR system, then are sent to another room to be logged in and have their signatures verified. Once this step is complete, they return to the sorting area to be sorted into precincts, and are then stored in a locked room until they can be opened and counted.

In the past, accurate precinct sorting was important because ballots were run through the tally machines by precinct. Elections now utilizes a process to help eliminate processing log jams on Election Day night caused by having to sort return envelopes by precinct before opening them. The sorting process used to cause a delay in ballots being moved on for opening, inspection, and tallying during very busy elections. The new

procedure allows them to sort by precinct up until a logical time on Election Day, then to process ballots by batch to move them through more quickly. Batched ballots are sorted into precincts after the election to aid in write-in tallying, conducting any necessary recounts, and reconciling the number of ballots received to the number of ballots counted. Elections reports that this change resulted in greater efficiencies and helped avoid the log jam of ballot return envelopes waiting to be sorted that normally occurs as the volume of ballots increases on Election Day.

*Findings* We observed that sorting activities are conducted efficiently. Staff members worked hard and were able to keep up with the flow of returns until Election Day, working on other tasks as time permitted. Elections has also implemented an innovative sorting technique that allows workers to conduct their work quickly. An additional check of all empty return envelopes helps to ensure that no ballots were missed during the opening process.

There was an occasional question about the validity of a ballot return envelope, necessitating its removal from the sorting area. When this occurred, the envelope was taken out of this room with no record or log as to who took it or the purpose of its removal. There is an increased risk of a ballot getting lost if it leaves the normal stream of processing without additional accountability, such as a log, to help ensure that it is accounted for. We recommend that Elections develop and maintain a log to control removal of any ballot return envelope from its batch in the sorting area once the signature has been verified. **See Recommendation III.**

## **11. Ballot Opening, Inspection, and Duplication**

Ballot opening, inspection, and duplication processes are guided by state laws that are essential to ensuring that voter intent is preserved and that every vote counts. Seven days before the election, ballots are opened and inspected by election boards. Elections had 114 workers for the opening, inspection, and enhancement of ballots: 26 boards with four workers on each plus those who operate the opening machines and move ballots to the boards. Elections structures their boards so that at least one of the four members of each board is of a different political party than the other three.

The election boards remove ballots from the secrecy envelopes and inspect each one to ensure that it is machine-readable so that the voter's actual votes will be recorded accurately. If a ballot is damaged or cannot

be read by the tally machine scanners it is later duplicated by hand onto a replacement ballot. If the marking is clear but not dark enough for the machine to detect, the ballot is enhanced with a marker that still allows the voter's original marking to be seen. Enhancing is also needed to correct ballots with extra marks, such as incomplete erasures, smudges, "X" marks in ovals, circled candidate names, etc, that machines might incorrectly read.

*Findings* We observed that boards worked diligently and for long hours. Most of these election workers have been doing this work for years and many were precinct workers before vote-by-mail. Space was crowded, but the runners who moved carts of unopened ballots kept the movement of ballots to boards running efficiently. The boards worked on only one precinct at a time until the cut-off on Election Day, when the precinct sort stopped and the ballots were sent directly to the boards in mixed-precinct batches. At the tables we observed, boards took care when recording the tally for write-in votes and followed the instructions they were given. Ballots with a write-in vote for an office that had no candidate filed were set aside to be tallied once all ballots for the precinct at that table had been processed.

Elections can improve its inspection processes by requiring consultation with other board members before a ballot is enhanced. According to state guidelines, the responsibility for determining voter intent lies with the inspection board, under the guidance of the Elections Director. When a question arises, guidelines state that a team of at least two board members of different political party affiliations should work together to determine voter intent. If the inspection board agrees on the voter's intent, the ballot should be enhanced or duplicated to reflect that intent and the enhanced or duplicated ballot should then be counted. If they do not agree, the ballot should be tallied as is.

According to Elections, markings with obvious voter intent are the largest part of enhancing ballots and do not require consultation. However, this leaves the important task of determining whether there is a question about voter intent up to an individual. Only rarely did we observe a board member consulting another before enhancing a ballot. This creates a risk for error and undermines the intent of the state requirement for multiple party inspection. We recommend that Elections have at least two board members of different political parties agree on all enhancements. **See Recommendation IV.**

Currently, there is no quality check on the enhancement work done by boards, either among the board members or by management. Additional oversight and quality control over the important work the boards do is key



to assuring that voter intent is carefully preserved. **See Recommendation IV.**

After Election Day, duplication boards make copies of ballots that were not machine-readable so that the copy can be run through the tally machines and the votes can be counted. The copies must accurately reflect original voter intent and must be proofed by a board member with a different party affiliation than the worker who did the copying. This check was not in place during our observations. Because of the risk of error, Elections should require a second proof reading for all duplicated ballots, per the state's guidelines. **See Recommendation IV.**

## 12. Vote Tallying

Tallying of votes begins on Election Day morning and continues until all votes are counted. In this process, an operator feeds a stack of ballots through the tally machine. As ballots move across the machines, light beams count the marks in the darkened ovals based on the specific position of the mark on the ballot. All six of the County's ES&S M650 tally machines were in operation on Election Day.

Elections tallies at least a portion of the ballots from every precinct before 8:00 p.m. so that the first published results contain some information from every race. The totals in each machine are saved after each precinct or batch is run, and at 8:00 p.m. totals are saved and downloaded into a computer that combines the totals for all six machines. This process is repeated throughout the night to update the public with election results.

*Findings* Tallying work was conducted in a conscientious, professional, and efficient manner. Elections management and temporary staff were knowledgeable about the operation of the machines and diligent in their efforts to make sure things went smoothly and all votes were counted. After some initial delays and adjustments, the service contractor was available to keep machines working without any significant disruptions. There was a good system in place for movement and storage of precinct-sorted ballots, keeping the workflow constant and the ballots organized. Workers had 43% of the votes counted by 8:00 p.m. on Election Day night. Final reconciliation of total ballots received to total ballots counted revealed a discrepancy of only 23 ballots out of 262,628 cast (.0088%).

We also observed the recount of a Troutdale City Council race after Election Day. This process was closely observed by both candidates and went smoothly.



Elections could improve elements of staffing for its tally machine operators by implementing shift work and training additional staff to operate the machines. The tally machine operators worked long hours; in some cases this was from 9:00 a.m. on Election Day until 6:00 a.m. the next morning. These long hours of being on their feet and doing redundant work resulted in exhaustion for staff and raised the risk of error. Additionally, machines were idle when workers took breaks, which delayed completion of the counting. **See Recommendation II.**

We observed a number of instances where tally machine operators enhanced ballots that the machines could not read, either by darkening the oval or using opaque stickers to cover smudges or incomplete erasures. As noted in the section above, any change made to a ballot should be verified by someone of a different political party than the person making the change. Elections should send all ballots that require enhancement back to the boards to do this work. **See Recommendation IV.**

## Recommendations

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- I. To standardize practice, clarify expectations, reduce the risk of error, and document critical elections processes, Elections should develop a policies and procedures manual covering all of its major internal operations.
- II. To better match existing staffing resources to needs, Elections should:
  - Cross-train workers on multiple functions so that they can step into tasks where demand is heavy and cover breaks.
  - Implement shift work during election periods to prevent fatigue, reduce error, and keep essential work processes moving.
  - Create skill redundancy for critical functions.
- III. To increase security, Elections should document the movement of ballots during the preparation of unmailed ballots (between the printer and the post office) and for any ballot return envelopes pulled from the Blue or Green Room after signatures have been verified.
- IV. Because of the sensitive nature of elections management, the need for transparency, and protection against error and fraud, Elections should:
  - Create a distinct barrier between the tally machine programming and the design and marking of the test deck.
  - Ensure that at least two board members of different parties agree on voter intent for all enhancements and duplications of ballots.
  - Discontinue allowing tally machine operators to make any enhancements to ballots. Ballots that need enhancement should be directed to the duplicating boards.
  - Add oversight and quality control to the work of the opening and inspection boards and the log in and signature verification staff.
- V. With recent improvements to the building, security has been improved. However, to further increase security, Elections should:
  - Prioritize the plans to remodel the Red, Orange, Green, and Blue Rooms due to the sensitivity of voted ballots.
  - Move office supplies to another location outside of the Red Room (where vote tally equipment is stored and used) until funding for the door replacement to the supply room becomes available.
- VI. Planning for VAT activities should include:
  - Adjusting the size of staff to the need for service.
  - Avoiding drawing resources away from other critical areas of elections work by seeking funding and policy direction via a formal program offer or dedicated portion of the base budget request.
- VII. To improve traffic movement, Elections should:

- In writing, specify the expectations for traffic movement with the agency providing these services and frequently monitor traffic to ensure it is flowing as quickly as possible.
- Further explore alternatives for improving traffic movement, such as the addition of a ballot box on Belmont, having Elections staff take ballots from cars without having them turn on to 11th (if they can do so safely), and redirecting non-voting traffic.
- Clearly communicate and post expectations for 8:00 p.m. cut off with Roads crews, runners, traffic management staff, Elections staff, and observers to increase consistency and transparency and reduce the risk of problems.

## **Appendix: Methodology**

## Appendix: Methodology

Direct observation of the November 2006 General Election was the primary methodology used in this audit. In addition, we conducted interviews, completed tests and analyses, and reviewed numerous reports and documents. Below is a list of the major audit procedures we employed.

### Observations:

- Before Election Day, we observed:
  - Signature verification for petitions
  - Voter registration, data entry, and scanning
  - Cut-off for voter registration
  - Training for Voter Assistance Teams (VAT)
  - Training for signature verification
  - Processes for special ballot processing such as military, absentee, overseas, and alternate format ballots
  - Process for proofreading ballots
  - VAT teams at care facilities registering voters and assisting them to cast their ballots
  - Ballot preparation and insertion into envelopes at vendor location
  - Ballot handling and post office pick up at vendor location
  - Some programming steps for the tally machines
- Throughout the election period, we observed:
  - Internal and public testing of programming for the election
  - Arrangements for drop boxes at each library branch
  - Staff pick-up of ballots from the post office, libraries, and other drop sites
  - Pre-sorting and batching of ballots and processing into OCVR
  - Signature verification of return envelopes
  - Processes for exceptions and challenge ballots
  - Sorting of verified ballots into precincts
  - Opening/inspection boards enhancement of voted ballots
  - Staff interaction with the public in the Elections Office
  - Movement and security of ballots in the Elections building
  - Public observation of election on and before Election Day
  - Front counter activities, line management, and customer service
  - Traffic management outside Elections Office
  - Ballot opening and inspection
- On Election Day, we observed:
  - Process for handling public observers
  - 8:00 p.m. Election Day cut-off process at multiple locations
  - Tally for write-in candidates
  - Counting of ballots
  - Election Day reconciliation of tally machine to computer for vote tally

- After the election, we observed:
  - Recount process for Troutdale City Council race
  - Continued counting of ballots
  - Continued signature verification and handling of exceptions and challenge ballots
  - Duplication boards
  - Final reconciliation
  - Post-election archive process

### **Interviews:**

- Elections management, full-time staff, and temporary staff
- State Elections Division staff
- Contractors and vendors who provide maintenance services for the tally machines
- County Facilities and the Alarms Office to assist in our review of building security
- Computer experts to assist us in our review of computer security
- Meetings with the post office, printers, and mailing bureau
- Elections officials from other counties
- Weekly Elections staff meetings

### **Testing and Analysis:**

- Voter registration records
- Voter turnout history
- Over- and under-votes
- Building and room access logs from May through November 2006
- Certification status of software on the computer and tally machines
- Results from the logic and accuracy tests for tally machines
- Computer security for tally machines, computers, and related software

### **Documents:**

- Relevant state laws and administrative rules
- Security plan submitted to Secretary of State
- Tally machine maintenance logs
- Reconciliation between ballots received and ballots counted
- Documents from the public logic and accuracy tests
- Various statistical reports from County and State Elections Offices
- Reports from OCVR
- VAT reports

**Background and Best Practices:** To understand best practices for elections we researched reports and other documents from a number of organizations. Following is a selected list of works consulted:

- “Ballot Definition Files: No Review is Provided for a Key Component of Voting System Software,” VotersUnite.org., Updated June 2006.
- “Ballot Integrity and Voting by Mail: The Oregon Experience,” a report for the Commission on Federal Election Reform, The Early Voting Information Center at Reed College, Dr. Paul Gronke, June 2005.

- “Best Practices Tool Kit,” United States Election Assistance Commission, revised January 3, 2006.
- “Black Box Voting: Ballot Tampering in the 21<sup>st</sup> Century,” Bev Harris, Talion Press/Black Box Voting, 2004.
- “City of Detroit: Review of the Department of Elections’ Absentee Vote Tabulation Process,” Office of the Auditor General, November 2002.
- “Election Reform: What’s Changed, What Hasn’t and Why, 2000-2006,” electionline.org, (administered by the Election Reform Information Project), February 2006.
- “Electionline Briefing: The 2006 Election,” electionline.org.
- “Electionline Briefing: Voter Registration 2006,” electionline.org.
- “Election Preview, 2006,” electionline.org.
- “Elections: Federal Efforts to Improve Security and Reliability of Electronic Voting Systems are Under Way, but Key Activities Need to Be Completed,” United States Government Accountability Office, GAO Report to Congress.
- “Final Report of the 2004 Election Day Survey,” Brace, Kimball W and McDonald, Dr. Michael P., United States Election Assistance Commission.
- “Guidelines for Creating a Deck of Test Ballots,” John Washburn, Certified Software Quality Engineer.
- “King County Audit of Elections Operations,” Cheryle A. Broom, King County Auditor, Washington State, October 2005.
- “Making the List: Database Matching and Verification Processes for Voter Registration,” Levitt, Welser, Munoz, Brennan. Center for Justice at NYU School of Law, March 2006.
- “National Task Force on Election Reform,” Sponsored by The Election Center, National Association of Election Officials, May 2005.
- “Report of the Oregon Elections Task Force,” Oregon Secretary of State Bill Bradbury and the Oregon Association of County Clerks, President Dana Jenkins, February 2001.
- “Voting – What Is, What Could Be,” CALTECH MIT Voting Technology Project, report from the collaborative project by California Institute of Technology and the Massachusetts Institute of Technology.
- “Voter Registration,” R. Michael Alvarez, April 2001
- “Voluntary Guidance on Implementation of Statewide Voter Registration Lists,” United States Election Assistance Commission, July 2005.

### **State and Federal Laws Applicable to Elections:**

#### State of Oregon

- Revised Statutes Chapters 246 through 260
- Oregon Administrative Rules 165
- Vote by Mail Procedures Manual

#### United States

- Elderly and Handicapped Act of 1984
- Help America Vote Act of 2002
- National Voter Registration Act of 1993
- Uniformed and Overseas Citizens Absentee Voting Act
- Voting Rights Act of 1965

## **Responses to Audit**





## Ted Wheeler, Multnomah County Chair

501 SE Hawthorne Blvd., Suite 600  
Portland, Oregon 97214  
Phone: (503) 988-3308  
Email: [mult.chair@co.multnomah.or.us](mailto:mult.chair@co.multnomah.or.us)

June 26, 2007

LaVonne Griffin-Valade  
Multnomah County Auditor  
501 SE Hawthorne, Room 601  
Portland, OR 97214

Dear Auditor Griffin-Valade:

Thanks to you and your staff for your excellent work in auditing the operations of Multnomah County's Elections Office and thank you for the opportunity to respond to your audit report.

We appreciate your positive review of our elections system and your recommendations for improvement. As you know, many of your recommendations have already been implemented, others are in process and some will depend on future funding.

Elections Office management has already compiled policy and procedures into manuals, cross-trained staff and revised procedures to separate programming of ballot tally computers from testing the accuracy of the programming and the computers. Several changes have been made to improve building and ballot security and others are planned.

While we have taken steps to make it easier for voters to drop off ballots at the Elections Office on Election Day we won't know if these steps are sufficient until we have another election with very high turnout. We will closely monitor traffic congestion outside the Elections Office and we will prepare to do whatever it takes to insure that all ballots are properly collected.

We appreciate your thoughtful review, your helpful suggestions and your willingness to work cooperatively with staff to produce the best outcome for the public.

Sincerely,

Ted Wheeler  
Multnomah County Chair

TW/rs



Department of Community Services

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**MULTNOMAH COUNTY OREGON**

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**Director's Office**

**1600 SE 190<sup>th</sup> Ave; Suite 224**

**Portland, Oregon 97233-5910**

**(503) 988-5000 phone**

**(503) 988-3048 fax**

## Response to Elections Audit

June 25, 2007

To: LaVonne Griffin-Valade  
Multnomah County Auditor

From: M. Cecilia Johnson  
DCS Department Director

It is with great appreciation that we respond to the completed Audit of Multnomah County Elections operations and processes. The commitment of time and resources made by the Auditor to this effort speaks to your office's dedication to performing the highest quality of professional audit inquiry, research and analysis. Certainly, the comprehensive approach taken in auditing processes reported in each of the twelve chapters of the technical report and summarized in the general report has been most helpful to the department and specifically the elections staff in our efforts to continuously improve.

We have been positively impressed by the specificity, detail, and conscientiousness provided by the Auditor and her staff during the several meetings prior to the completion of this audit and in the final report document. I can not say enough to praise the auditor's staff efforts to maintain balance and objectivity while providing essential feedback to the citizens we serve. The collaborative attitude of staff and the cooperative and respectful work style of those assigned to complete this audit were no less than admirable.

Because we have the opportunity in any given fiscal year to administer multiple elections, we immediately went to work to implement many of the recommendations for improvement. We have noted several of these actions in our response to the technical report.

Certainly, it is our pleasure to endorse the findings of this audit report and to continue working with the Auditor's office in the implementation and follow up of the recommended improvements noted.

## RESPONSE TO RECOMMENDATIONS IN THE TECHNICAL REPORT

### I. Policies and Procedures Manual

We wholeheartedly agree with the recommendation to develop and improve our internal written policies and procedures. Since reading the initial drafts of the technical report, we have written (and used during the May 2007 election) individual procedure manuals on the following tasks and work areas:

- “Front Office/Front Counter” which includes voter registration, issuing ballots, beeping/signature verification and front counter procedures;
- “Ballot Pick-Up” covering all major activities and job responsibilities for the runners;
- “Observer Monitors” providing written direction to those who monitor the election observers;
- “Duplication Board” processing;
- “Ballot Counting” operation; and
- “Logic/Accuracy” covering the procedures involved with testing and verification of the computer program as well as the operation of the vote tally machines.

Additionally, individual procedures are written or in process to cover areas such as programming, ballot definition, quality control at the mail house and working with vendors and the post office.

### II. Staffing Recommendations

- A. Cross-Training: We have implemented and continue to work on cross-training staff (regular and temporary) to step in when demand is heavy and over breaks in all work areas including: running tally machines, front counter work, signature verification, sorting, supervising opening boards and processing exception ballots.
- B. Skill Redundancy: We will identify business critical functions and ensure that at least two staff members are trained in and experienced enough to perform these functions in the event of unexpected absence, position vacancy or retirement. We have completed this task with programming/testing, work at the mail house, ballot processing, signature verification, opening boards and running vote tally equipment.
- C. Shift Work: We have developed and submitted a plan to the Secretary of State’s Election Division which would send certain regular and temporary staff home early on the evening of Election Day so that they can return after midnight to keep critical work processes moving. Critical work after the opening boards are sent home includes signature verification and running the vote tally equipment. We will explore other alternatives, as well, to use staff efficiently while still seeking to assure the level of quality and accuracy of ballot processing.

### III. Documenting the Movement of Ballots:

We will maintain copies of invoices and receipts of delivery for blank ballots sent from the printer to the mail house and picked up by the postal service. We will develop a log for pulling unopened ballot envelopes from the Blue and Green Rooms after signatures have been verified.

### IV. Controls to Ensure Votes are Counted Accurately:

A. We have separated the duties of programming from those of designing the test deck and giving instruction to the temporary workers who mark the test decks. Because of the need to also provide skill redundancy (II.B.), a second person is trained to program and we are training a third person to be responsible for designing and coordinating the marking of the test decks.

B and C. Instructions have been re-written to clearly state the need that questions regarding voter intent need to be resolved through agreement with opening board members who are not of the same political party. Duplication of any ballots which are unreadable by the vote tally machines will also be checked and agreed to by more than one person.

D. Enhancing ballots was not done in the Red Room for the May 2007 election and any ballots needing enhancement will be processed by a duplication board.

E. Supervision to improve quality control will be provided for the work of the opening boards and the beeping/signature verification staff.

### V. Building Enhancements

A. With the approval of the County Commissioners, we plan to remodel the Red, Orange, Green and Blue Rooms in FY08. Plans include replacing doors and providing card readers to limit access to the rooms during an election.

B. We have moved the most used items from our storage room to the hall where office mail is processed. A door from the Bay Area into the storage room is also in the plans for FY08, subject to approval by the County Commissioners.

### VI. VAT Activities

A. The number of people hired to work on Voter Assistance was reduced for the May 2007 election. This number will vary in 2008 as demand grows

for the Presidential Primary and General Elections. We have applied to the Pew Charitable Trust for a grant to study the effectiveness of VAT work in November 2006 and May 2007. If we are awarded this grant, it will also provide for a pilot to extend VAT work to local hospitals in November 2007 and the Primary in 2008.

- B. Parameters for VAT work will be more clearly defined and will not draw resources away from other critical areas of elections work. VAT members are being cross-trained to provide backup at break times for front office as well as for observer monitors and assist with calling voters who neglect to sign their return envelopes. VAT members also assist after 8:00 pm Election Day by monitoring the parking lot across the street, checking in ballots delivered by the libraries and monitoring ballot delivery at the drop boxes at the Election Office at 8:00 pm.
  - i. Results from the Pew Grant (if approved) will be used to establish a budget and will help us more clearly define the scope and objective of the VAT.
  - ii. Depending on the results from the Pew Grant, we will either submit a Program Offer for FY09 or add to the appropriate cost center to cover the Presidential General Election in November 2008.

## VII. Traffic Issues

- A. For the May 2007 election, we had written specifications for traffic movement and control with the Multnomah County Road Department. We had excellent cooperation from the City of Portland as it approved a traffic plan which we will continue to refine as we anticipate the Presidential elections in 2008.
- B. With approval by the County Commissioners, we plan to add a permanent ballot box in FY08 on Belmont with a chute sending ballots into our basement. For safety issues, we do not plan to have our staff on the street at any location to take ballots from voters in vehicles.
- C. Our manual for the runners is clear as to expectations at the 8:00 p.m. cut-off. Everyone is told that anyone in line to vote at 8:00 p.m. will be allowed to vote.

Again, we have appreciated the opportunity to work with the Auditor's office in this effort and look forward to the continued collaboration we have developed. Should you have questions or need for further information, do not hesitate to contact me.



M. Cecilia Johnson