



Texas Secretary of State
ELECTIONS DIVISION



Audit Insights: Learning from Past Elections

43rd Annual
Election Law Seminar
for County Election Officials
August 11-13, 2025



Lessons Learned - Policies and Procedures

Counties can articulate procedures but do not have written documentation.

There are policies in place, but they are not updated regularly to reflect current processes being practiced by staff and/or workers.



Lessons Learned - Training

Training is by far one of the most important things that we see that is lacking documentation. Your training should include how to complete all required paperwork with examples. Your training should require hands on training and not be optional for your workers.

We encourage you to spend some time evaluating your training program. It has the biggest impact on the success of your elections and your story.



Lessons Learned - Chain of Custody

Counties have chain of custody forms but not for all election equipment. We highly encourage you to audit your chain of custody forms. What we have seen is incomplete forms, missing data on forms, no chain of custody of equipment. This is the most common finding we have seen to date.

Incomplete paperwork or missing forms open the door to questions with no documented answer and may even lessen confidence in the election process.



Lessons Learned - Reconciliation

What we have seen is a discrepancy in cast ballot reports vs. pollbook check ins reports with no documentation of the reason for the discrepancy or anomalies that took place.

We have also experienced reports (example-ballot by mail) that do not match the numbers reported on your reconciliation forms.

It is essential that your saved data reports and documentation (paperwork) match your voting systems report and your reconciliation forms.

Don't open the door for questions or concerns. If you discover a problem or discrepancy...document your findings and any contributing information.



Lessons Learned - Partial Manual Count / Post-Election Hand Count Audit

Early Voting Precinct	Candidates	Early Voting in Person Electronic Count	Early Voting in Person Hand Count	Discrepancy	Early Voting Mail Ballot Electronic Count	Early Voting Mail Ballot Hand Count	Discrepancy
1	DONALD J. TRUMP/D VANCE	562	562	0	16	16	0
	KAMALA D. HARRIS/TIM WALZ	1558	1558	0	85	85	0
	CHASE OLIVER/MIKE TERESAAT	17	17	0	0	0	0
	JILL STEIN/WUDOLPH WARE	22	22	0	2	2	0
	SHIVA AYYADURAI/CRYSTAL ELLIS	0	0	0	0	0	0
	JESSIE CUELLAR/WESLEY LASLEY	0	0	0	0	0	0
	CLAUDIA DE LA CRUZ/KARINA GARCIA	4	4	0	0	0	0
	CHERUNDA FOX/NARLAN MCVEY	0	0	0	0	0	0
	PETER SONSKY/LAUREN OMAK	0	0	0	0	0	0
	CORNEL WEST/MELINA ABDULLAH	0	0	0	0	0	0
	UNCERTIFIED	7	7	0	0	0	0
	UNDIVIDED	5	5	0	0	0	0
	OVERVOTES	0	0	0	0	0	0
2	DONALD J. TRUMP/D VANCE	877	877	0	0	0	0
	KAMALA D. HARRIS/TIM WALZ	798	798	0	0	0	0
	CHASE OLIVER/MIKE TERESAAT	16	16	0	0	0	0
	JILL STEIN/WUDOLPH WARE	15	15	0	0	0	0
	SHIVA AYYADURAI/CRYSTAL ELLIS	0	0	0	0	0	0
	JESSIE CUELLAR/WESLEY LASLEY	0	0	0	0	0	0
	CLAUDIA DE LA CRUZ/KARINA GARCIA	1	1	0	0	0	0
	CHERUNDA FOX/NARLAN MCVEY	0	0	0	0	0	0
	PETER SONSKY/LAUREN OMAK	0	0	0	0	0	0
	CORNEL WEST/MELINA ABDULLAH	0	0	0	0	0	0
	UNCERTIFIED	4	4	0	0	0	0
	UNDIVIDED	8	8	0	0	0	0
	OVERVOTES	0	0	0	0	0	0
3	DONALD J. TRUMP/D VANCE	909	909	0	20	20	0
	KAMALA D. HARRIS/TIM WALZ	1304	1304	0	60	60	0
	CHASE OLIVER/MIKE TERESAAT	21	21	0	1	1	0
	JILL STEIN/WUDOLPH WARE	12	12	0	0	0	0
	SHIVA AYYADURAI/CRYSTAL ELLIS	0	0	0	0	0	0
	JESSIE CUELLAR/WESLEY LASLEY	0	0	0	0	0	0
	CLAUDIA DE LA CRUZ/KARINA GARCIA	0	0	0	0	0	0
	CHERUNDA FOX/NARLAN MCVEY	0	0	0	0	0	0
	PETER SONSKY/LAUREN OMAK	1	1	0	0	0	0
	CORNEL WEST/MELINA ABDULLAH	0	0	0	0	0	0
	UNCERTIFIED	14	14	0	0	0	0
	UNDIVIDED	17	17	0	0	0	0
	OVERVOTES	0	0	0	0	0	0
Reason for Discrepancies:							

What we have seen is that the tally sheets do not add up to the totals when compared to the election results



Lessons Learned - Partial Manual Count / Post-Election Hand Count Audit

OFFICIAL RESULTS

Electronic Count =
Election Results Submitted to the SOS

214,631

U. S. REPRESENTATIVE DISTRICT 3



KEITH SELF

112,252



SANDEEP SRIVASTAVA

100%

5807 of 5807 Polling Locations Reporting



Lessons Learned - Partial Manual Count / Post-Election Hand Count Audit

[illegible]

Hand Count = Tally Sheets Totals

LESSONS LEARNED



Texas Secretary of State
ELECTIONS DIVISION



Audit Standards



Audit Standards

Voter Registration

- To ensure that only eligible voters in the State of Texas have the ability to cast their vote with confidence.

Principle #1: Voter Registration

To ensure that only eligible voters in the State of Texas have the ability to cast their vote with confidence.

1.1 – Ensure the accuracy of the statewide voter registration list.

1.1.1 – Voter registration list maintenance activities are conducted to ensure consistency and accuracy (TEC Sec. 16, 14.021 – 14.023, 15.051, 15.053).

1.1.2 – The list of registered voters from each precinct is accurately reflected in the statewide voter registration system which serves as the Official List of Registered Voters (TEC 15.022).

1.1.3 – Voter registration lists are consistently updated to remove voters that no longer meet eligibility requirements such as, but not limited to: death, felony convictions, and non-US citizen status (TEC Sec. 16).

1.1.4 – Voter registration lists are consistently updated to ensure all voters meet residency requirements (TEC 15.051).

1.1.5 – County registration records are reviewed periodically to remove duplicate registration records (TEC Sec. 16.034, 18.062).

1.1.6 – Voter registration records are accurately managed to ensure the protection of voters in a confidentiality program (TEC 15.0215).

1.1.7 – Volunteer deputy registrar (VDR) certification processes and qualified VDR lists are reviewed to ensure an accurate and complete record of VDRs in the county (TEC 13, Sub. B).



Audit Standards

Accessibility

- Ensure that county communication regarding elections information, elections equipment, and polling places are accessible to all voters.

Principle #2: Accessibility

Ensure that county election information, election equipment, and polling places are accessible to all voters and that the information is being communicated properly to voters.

2.1 – Polling places are compliant with ADA standards.

2.1.1 – Polling places, maintained by the county or third-party vendor, are checked for their accessibility compliance prior to the election (TEC Chapter 43).

2.1.3 – At least one bilingual poll worker is available at each polling place (TEC 272.09).

2.1.4 – County procedures ensure that all polling places have ADA accessible voting equipment and the option to vote curbside for voters unable to enter the polling place (TEC 64.009, 104.004).

2.1.5 – Postings for Notice of Voter Order Priority are visible to voters entering the polling place and queuing to enter the polling place (TEC 63.0015).

2.2 – County public communication efforts are designed and implemented in ways that are accessible to all voters.

2.2.1 – The county election's website is accessible to all voters (SB 477, Sec 63.0015).

2.2.2 – Announcements or notices are accessible to ensure that all voters are informed of changes.





Audit Standards

Training

- Election officials have the necessary knowledge, tools, and resources to facilitate confidence in the ability to conduct a secure and accurate election.

Principle #3: Training
Election officials have the necessary knowledge, tools, and resources to facilitate confidence in the ability to conduct a secure and accurate election.

3.1 – County election office training establishes the necessary knowledge, tools, and resources to facilitate a secure and accurate election.

3.1.1 – Training materials and handbooks are produced and periodically updated to reflect accurate, up-to-date information (TEC 32.111).

3.1.2 – Election security training is periodically conducted for all pertinent county officials (TEC 279.003).

3.1.3 – Trainings for the Early Voting Ballot Board (EVBB), Signature Verification Committee (SVC), Central Counting Station, and Post-Election Audit procedures are periodically conducted to ensure preparedness.

3.2 – Poll worker training establishes the necessary knowledge, tools, and resources to facilitate a secure and accurate election.

3.2.1 – Poll workers have completed a rigorous training program to understand polling place setup, opening and closing the polls, qualifying voters, chain-of-custody, reconciliation, and election security (TEC 32.111).

3.2.2 – Poll workers are instructed on the county's election equipment to verify proper usage.

3.2.3 – Poll workers are assessed at the conclusion of training to ensure general understanding of election procedures (TEC 32.115).





Audit Standards

Ballot-by-Mail

- Guarantee that the processing of mail-in ballots is completed with a focus on accuracy and security.

Principle #4: Ballot-by-Mail

Verify that the processing of mail-in ballots is completed with a focus on accuracy and security.

4.1 – Applications for ballot-by-mail are timely and accurately processed.

4.1.1 – Applications for ballots-by-mail are reviewed to determine eligibility (TEC 86.0015).

4.1.2 – Applications for ballots-by-mail are with the statewide database to ensure voters have the ability to correct any defects (TEC 86.008, 86.009).

4.2 – Ballots-by-mail are timely and accurately reviewed.

4.2.1 – The Early Voting Clerk has created a process to document the lifecycle of ballots, envelopes, and carrier envelopes to ensure security of the voted ballots and materials.

4.2.2 – Ballot-by-mail acceptance or rejection, and corrective actions, are communicated to voters (TEC 87.041).

4.2.3 – Ballots-by-mail are reviewed for all information submitted by voters through the Ballot by Mail Tracker as part of the corrective action process to ensure that corrected information is presented to the ballot board for consideration (TEC 86.015).

4.2.4 – A process for transmitting balloting materials to the SVC, EVBB, and back to the Early Voting Clerk has been adopted to ensure security of materials (TEC 87.021).



Audit Standards

Chain-of-Custody

- The chronological documentation or paper trail that records the sequence of packaging, custody, control, transportation, transfer, analysis, storage, and disposition of physical or electronic evidence.





Audit Standards

Election Security

- Procedures followed or measures taken to ensure the safety of the election equipment, data, records, and process.

Principle #6: Election Security

Procedures followed or measures taken to ensure the safety of the election equipment, data, records, and process.

6.1 – County election procedures are established and followed to protect against cyber and physical attacks.

- 6.1.1 – A written copy of all election security policies and plans is maintained by the election office.
- 6.1.2 – A Written Information Security Program (WISP) is maintained and updated to ensure accurate county procedures to protect against cyber security threats (TEC Sec. 279).
- 6.1.3 – A record of any cyber security incidents experienced is maintained by the election office (TEC 279.003(c)).
- 6.1.4 – The county policies and procedures for determining access, requesting credentials, and protocols for secure, personnel access to the statewide voter registration database should be retained and maintained for security reasons.
- 6.1.5 – County elections staff completes the required annual cybersecurity training offered by the Secretary of State (TEC 279.003(a)).
- 6.1.6 – A record of all past, and present, physical security threats the county has experienced is maintained.
- 6.1.7 – A county recovery plan is established for any breach in security procedures (TEC 129.051(f)).

6.2 – Security precautions and preparations are made to reduce risks to the conduct of the election's office.

6.3 – Voting equipment and systems are programmed and tested before each election, before the counting of ballots, and at the conclusion of the counting of ballots to ensure accuracy.

- 6.3.1 – A maintenance schedule for election equipment is developed and maintained by the county election office.
- 6.3.2 – A Vendor Risk Management Policy for third-party vendors is maintained to ensure security of elections systems (Texas Election Security Toolkit).
- 6.3.3 – Policies and procedures for programing and preparing the ePollbooks and all other voting equipment is developed and maintained.
- 6.3.4 – Procedures are developed and maintained for the preparation and programming of ballots (TEC Sec. 52, Subchapter A).
- 6.3.5 – Procedures for the preparation of each type of paper ballot are developed and maintained by the county (TEC 52.061(b)).
- 6.3.6 – Procedures are developed and maintained for ballot proofing.
- 6.3.7 – A process for hash validation is developed to ensure the accuracy of election equipment (TEC 129.023).
- 6.3.8 – Logic and Accuracy (L&A) testing procedures are developed to ensure accuracy, security, and transparency (TEC 129.023).
- 6.3.9 – Security measures for the Central Accumulator must be developed and maintained.
- 6.3.10 – The number of ballots reserved, and the number distributed from the reserve to each polling place is documented to ensure ballots security and chain of custody (TEC 51.008).

6.4 – Voting equipment and systems are secured during transport, voting, and storage.

- 6.4.1 – All election records and documentation pertaining to conducting an election including, but not limited to, chain of custody documentation, ABRM/BRM material, provisional ballots, and other election materials are maintained in a secure location.
- 6.4.2 – Records retention documentation is maintained.
- 6.4.3 – Video surveillance and live streaming of the canvass is required for counting equipment and voted ballots.
- 6.4.4 – Election workers are required to sign off on all supplies and equipment when picking up and delivering materials (TEC 129.051).
- 6.4.5 – Detailed procedures for securely storing and transporting voting system equipment are developed and maintained to ensure the security of the equipment (TEC 127.066).
- 6.4.6 – The number of ballots and the range of serial numbers are recorded for each Election Judge and Deputy Early Voting Clerk when they are distributed (TEC 127.064).
- 6.4.7 – The process for collecting ballots, paperwork, and equipment following an election is established and disseminated to ensure compliance with security protocols and chain of custody procedures (TEC 127.067).
- 6.4.8 – The Central Counting Station plans must be developed, maintained, and posted to the county website to ensure security of election materials (TEC 127.001).
- 6.4.9 – Ballot boxes are secured at the conclusion of voting each day to prevent unauthorized deposits (TEC 85.032).
- 6.4.10 – Voter registration applications, ballot-by-mail applications, statements of intent to vote, and voter registration certificates are securely stored to ensure security of the information (TEC 66.058(a)).
- 6.4.11 – Procedures are developed and maintained to ensure the security of the Central Counting Station must be inspected to verify that they correspond with the record of serial numbers kept by the general custodian to ensure security and chain of custody of ballot boxes (TEC 87.101).
- 6.4.12 – Records retention documentation is maintained.
- 6.4.13 – Video surveillance and live streaming of the canvass is required for counting equipment and voted ballots.
- 6.4.14 – All electronic voting systems must be secured during transport, voting, and storage.
- 6.4.15 – Procedures are established for the handling of spoiled, used, or otherwise damaged ballots.
- 6.4.16 – A signed Receipt of Transfer must be provided by the Presiding Judge of the Central Counting Station to each Presiding Judge after they have delivered their voted ballots and electronic media (TEC 127.068).
- 6.4.17 – Any known procedural or chain of custody defects or discrepancies are documented.
- 6.4.18 – Procedures are established for the handling of spoiled, used, or otherwise damaged ballots.
- 6.4.19 – Any known procedural or chain of custody defects or discrepancies are documented.



Audit Standards

Election Results

- Verify that all voting results are reconciled to guarantee accurate and timely election results.





Texas Secretary of State
ELECTIONS DIVISION



Best Practices



Brainstorm

Prompt:

- What are two things your office is efficient with regarding elections processes?
- What is one thing you want to improve upon in your office to be more efficient?

*Written election
security processes*

*Chain-of-custody
with all election
equipment*

*Poll worker
training*

Reconciliation

You will have
5 minutes
to brainstorm



**Work together with people
at your table and the table
directly behind you**



Best Practices - Policies and Procedures

What we have experienced:

- Written policies provide transparency in your process and a basis for the accurate administration of elections. It is a reference, a resource for all staff and workers.
- Do you have written policies and procedures? Are they accurate? This is a great place to start your self-auditing review.





Best Practices - Security Plan

Our election community has spent the last few years focusing on the importance of election security and election integrity. All election entities should have written security plans in place to ensure protection from cyber attacks, to protect confidential information, to address physical security needs for staff, election workers and our voters.

Do you have security plans in place? Who are the key players? Are responsibilities and actions coordinated and clearly defined? Has training been provided? Are you prepared?

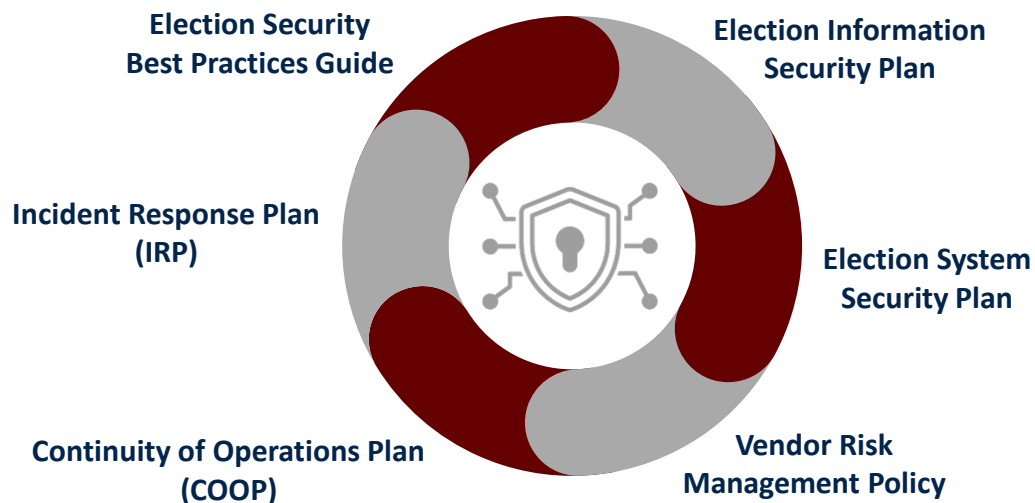




Best Practices - Security Plan

Most often, we find that election officials are dependent on IT personnel for security planning which is understandable. But, you should have a thorough understanding of the processes and plans.

If the answer is no, a good start is the **Election Security Toolkit** provided by our office:





Best Practices - Training

What does your training program include? Does your training program include everything that takes place with written steps on how to process voters? How to open and close the polling location? How to reconcile the paperwork from the polling location? How to setup and operate equipment? Hands on training? **Don't just tell them how to do something, show them.**

Are the training materials accurate and up-to-date? How often do you update?

How do you assess effectiveness of your training program? Are you sending out a survey, are you asking in class? Do you test the training efficiency on staff or temp workers?





Best Practices - Training

Do they align with all legal requirements?

Training is by far one of the most important things we see that is lacking documentation. When asked, many people have policies and procedures in place in their head but lack clear training guides and teaching tools.

We encourage you to spend some time evaluating your training program. **It has the biggest impact on the success of your elections and your story.**





Best Practices - Chain of Custody

Do you have a chain of custody that documents:

- Inventory of all equipment assigned to each location
- Voting Equipment (Transfer of Custody form)
- ePollbooks (Transfer of Custody form)
- Ballot Bins (Transfer of Custody form)
- Media Sticks (Transfer of Custody form)
- Provisional Ballots (Transfer of Custody form)
- Mail Ballots (Transfer of Custody Transmittal forms from EA/County Clerk to Ballot Board and back to EA/CC)
- Limited Ballots (Transfer of Custody form)
- Inventory of all supplies assigned/returned
- Seal logs signed and completed
- Ballot Paper (Ballot Paper distribution list)
- Supply Cabinets/Rolling Carts





Best Practices - Reconciliation

Are the results tapes printed and verified at the polling location?

Do those totals match the totals on the polling location reconciliation forms?

How do you document any issue, discrepancy and anomalies at your location?

What happens when the results do not match? What is your process?





Available Support



WEBINARS



TRAINING



RESOURCES

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800-252-VOTE • 512-463-5650

sos.texas.gov