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Elections, Recording & Records Management

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To: Jodi Cochran, County Internal Auditor
Office of County Internal Audit, Clackamas County

Re: 2023 Revised management response to 2021 County Internal Audit audit report and recommendations

As the newly elected Clackamas County Clerk, I have reviewed the results of the 2021 County Internal Audit report, *Elections Ballot Security: Observers welcome – Chain of custody enhancements will further support a transparent ballot processing environment.* I appreciate the independent and objective assessment of our election processes. I also value the continued efforts of our election staff to administer secure and accurate elections within Clackamas County.

The audit report, dated September 2021, resulted in four recommendations addressing physical security and chain of custody enhancements. All four recommendations were offered to support the processing of voted ballots. My Office agrees with all four recommendations and submits the revised responses (Attachment A). Process improvements and risk-mitigating actions will be fully implemented by March 2023 and will be in place for the May 16, 2023 Special District Election, if not the March 14, 2023 Special Election.

To increase transparency and accountability for both the County and the County Elections Division, I formally request the Office of County Internal Audit conduct a review engagement addressing the status of the four recommendations and associated risks identified in the September 2021 County Internal Audit report.

My Office looks forward to working with your team and sincerely appreciates any Office of County Internal Audit resources which can be allocated to this request.

Attachment A

2023 Revised Management Responses to 2021 County Internal Audit, Elections Ballot Security: Observers welcome – Chain of custody enhancements will further support a transparent ballot processing environment

Submitted March 8, 2023

#	Recommendation	Response
1	Require both ingress and egress door access scans - The County Clerk should establish and implement a scan in/scan out protocol for individual access to all secure Elections processing areas	Elections agrees with this recommendation and with the support of Facilities has implemented scan in/scan out protocol for all individual access to all secure Elections processing areas. This was completed in November 2021.
2	Secure loading dock door - The County Clerk should ensure all access doors to Elections processing areas are closed and locked at all times. When actively receiving deliveries with an open loading dock door, all other doors in the receiving, sorting, and signature verification areas should be closed and locked. To address noted concerns, the County Clerk should: <ul style="list-style-type: none">✓ Install a doorbell, or similar notification device, on the outside of the loading dock door to alert staff inside when delivery access is required.✓ Ensure appropriate employee building access is granted to temporary Elections workers and that all temporary workers used the employee entrance.✓ Address temperature and air quality concerns with Clackamas County Facilities and consider other ventilation options.✓ Post signs stating doors must remain secured during election processing activities.	Agree with the recommendation. County Telecom services has installed a doorbell and monitor for security camera on the outside of the loading dock door. Temporary election worker badge access is reviewed by Elections Manager prior to each election. All temporary workers are instructed to use the designated employee entrance. Signs have been posted stating doors must remain secured during election processing activities. Target implementation date: February 2023
3	Enhance receipt protocols for damaged or non-standard return envelopes - The County Clerk should enhance	Agree with recommendation and implementation is currently in progress for the next election (March 14, 2023 Special Election).

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	<p>receipt protocols for damaged or non-standard return envelopes by:</p> <ul style="list-style-type: none">✓ Placing receptacles or small hanging bins for exception items (i.e., damaged return envelopes, envelopes for other counties, garbage, etc.) in the receiving area.✓ Enhancing and documenting the receiving procedures to include the use of an exception log for items received which cannot be processed under normal protocols, including damaged or non-standard return envelopes which cannot be processed through sorting machine. This log should be created by receiving personnel for the items secured prior to transferring custody to the Elections supervisor for manual processing.✓ Enhancing and documenting reconciliation processes to include reconciling the exceptions receipt log to the OCVR system.	<p>In February 2023, Election staff placed designated receptacles for any exception items received during ballot intake. These receptacles are a unique style – not used in any other ballot flow processes. Operator procedures have been updated and logs created for tracking all items received during intake, including ballots for other counties, non-ballot items, or ballots that require manual processing by Elections supervisor. Daily procedures have been updated to include reconciliation of all ballot sorter data to the OCVR system.</p> <p>Target implementation date: March 14, 2023</p>
4	<p>Confirm Inspection Control Log batch reconciliations - The County Clerk should enhance the Inspection Control Log documentation and reconciliation process by:</p> <ul style="list-style-type: none">✓ Requiring manual confirmation of the original batch count, the beginning number of return envelopes to be opened, and the ending number of ballots to be tallied. Team members' signatures should attest to this confirmation. The Opening and Inspecting Table Instructions should be updated to include manual count procedures.	<p>Agree with recommendations.</p> <p>Chain of custody logs have been updated by election staff to require manual confirmation of ballots counted in a batch by the opening team prior to batch being processed at the tables. The second count will be conducted by the envelope opening machine and verified by the opening team against the batch count provided by the ballot sorter/OCVR. Batches required to be manually prepared will be reconciled against the batch report in OCVR (in lieu of a tray tag provided by the ballot sorter)</p>

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	<ul style="list-style-type: none">✓ Enhancing documented verification that the number of ballots to be tallied reconciles with the final number of ballots scanned. A signature block should be added to the Inspection Control Log to allow for the scanner’s signature and attestation of the confirmation. Scanning instructions should be documented to include enhanced verification procedures, including immediate supervisor notification of discrepancies.✓ Ensuring the Original Batch Count for all manually prepared batches, those damaged or non-standard return envelopes manually entered into the OCVR system and without a system generated tag, is supported by an OCVR report attached to the Inspection Control Log. Instructions for preparation of manual batches should be documented to include this reconciliation procedure.	<p>and the exemption log from the ballot intake sorter prior to opening. The batch will be counted a third time by the high speed document scanners used in the tally system after inspection. Any discrepancies at each stage are to be reported immediately to a supervisor for audit/reconciliation. All election worker teams – opening teams, inspection teams, scanning/resolving teams – are required to sign their daily logs. Login credentials for signature verification and the tally system are user-specific allowing the each system to log all activity by user. All new processes are partially implemented, targeting full implementation during the March 14, 2023 Special Election.</p> <p>Target implementation date: March 14, 2023</p>
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