

SOUTH CAROLINA

ELECTION COMMISSION

October 2025

AN IN-DEPTH REVIEW OF CHARLESTON COUNTY'S BALLOT RECONCILIATION WORKSHEETS FROM THE NOVEMBER 2022 GENERAL ELECTION

The mission of the South Carolina State Election Commission (SEC) is to ensure every eligible citizen can register to vote and participate in fair and impartial elections, knowing that every vote counts and every vote matters.

Pursuant to S.C. Code §7-3-20(D)(3), the SEC is authorized to conduct audits of county boards of voter registration and elections to ensure those boards' compliance with applicable state or federal laws or SEC policies, procedures, or standardized processes regarding the conduct of elections or the voter registration process by all persons involved. These audits are conducted by the SEC's Audit Division.

Additionally, S.C. Code §7-3-25(A) authorizes the SEC to identify any compliance failures and establish and implement a corrective action to remedy such failures. Recommendations in this report will require implementation of a corrective action plan that is developed by the county and approved by the SEC's Audit Division.

SOUTH CAROLINA STATE ELECTION COMMISSION

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Summary of Results

For the November 2022 General Election, 79% of Charleston County's ballot reconciliation worksheets were completed, and 21% were reconciled. Of the 21% of worksheets that were partially completed, this was likely due to the lack of a requirement from the State Election Commission (SEC) to fill every field, even if zero. Since the election, the county has provided in-depth ballot reconciliation worksheet training to its poll clerks that details the entire worksheet as well as hands-on training exercises. Additionally, the county reviews these worksheets with clerks, requiring explanations for any imbalances on the worksheet. Adequately completing and reconciling the ballot reconciliation worksheets for each polling location may give greater assurance that the results include all valid ballots cast.

Background

As defined by the U.S. Election Assistance Commission, ballot reconciliation is the method in which election officials keep track of each ballot that has been printed or issued to a voter. Tracking the number of ballots printed, used, and unused during an election cycle ensures election officials have accounted for every ballot created and the election results include every valid ballot cast.

In South Carolina, printed paper ballots were not common until the state's current voting equipment was implemented in all 46 counties in 2020. Prior to then, the state used a direct recording electronic, or DRE, as part of its voting system. A DRE is a vote capture device in which ballots are displayed, selections are made, and results are stored all via electronic format. The exceptions to this were the ballots printed for voters whose right to vote had been challenged at the precinct or who had moved but were still allowed to vote and the printed ballots used in emergency situations. Since these ballots were the only ballots in paper form, these were the only ballots that could be accounted for at the time.

South Carolina's transition in February 2020 to a paper-based voting system, with 100% printed paper ballots, significantly altered the process of accounting for ballots. In preparation for the change to this new system, the SEC developed a ballot reconciliation worksheet in September 2019 to account for and reconcile ballots supplied, used, not used, and lost as well as the number of voters who voted. Over the last five years, there have been minor updates to the worksheet, but it remains generally the same as the September 2019 version. Figure 1 below is an image of the ballot reconciliation worksheet used during the 2022 November General Election. It is important to note that a description of the worksheet and the terms used within are included in the analysis that follows.

Figure 1: S.C. State Election Commission's Election Day Ballot Reconciliation Worksheet

County _____ Precinct _____ Date _____

Ballots Supplied		
A	Ballot Cards (Completed by County Office)	
B	Hand-Marked Paper Ballots (Completed by County Office) (Emergency/Provisional + Failsafe Provisional)	
C	Additional Ballot Cards	
D	Additional Hand-Marked Paper Ballots (Emergency/Provisional + Failsafe Provisional)	
Total 1		

Ballots Used		
E	Ballots Scanned (Ballot Cards and Emergency Ballots) (Number displayed on the Scanner/DS200)	
F	Provisional Ballots (Hand-Marked Paper Ballots/Envelopes)	
G	Spoiled Ballots (Ballot Cards + Hand-Marked Paper Ballots)	
Total 2		

Ballots Not Used		
H	Ballot Cards	
I	Hand-Marked Paper Ballots (Emergency/Provisional + Failsafe Provisional)	
Total 3		

Voters Checked In		
J	Electronic Poll Book (EPB)	
K	Paper Poll List (Include Provisionals NOT entered in the EPB) (DO NOT Include Curbside Poll List)	
Total 4		

Total 2 + **Total 3** = (Should equal Total 1)

Total 4 + **G** = (Should equal Total 2)

Explain any discrepancies:

Are you returning any Emergency ballots that have not been scanned? Yes ☐ No ☐

(Do NOT include Provisional or Failsafe Provisional ballots)

SEC FRM 1150-202208

every vote matters.
every vote counts.

Source: S.C. State Election Commission

State Law and SEC Requirements

While state law only requires ballot reconciliation for election day, the SEC’s standardized operating procedures mandate this process for absentee and early voting as well. However, the scope of our audit was limited to election day ballot reconciliation, specifically for the 2022 November General Election. Therefore, the following sections provide an overview of the legal requirements for ballot reconciliation and the SEC’s ballot reconciliation worksheet as they pertain to election day.

Overview

S.C. Code §7-13-1150 requires poll clerks—the lead poll managers—to account for all ballots delivered to them and return the number of ballots supplied, spoiled—ballots that were defaced or marked in error—unused, voted, and lost, if any. S.C. Code §7-13-1410 requires poll managers to count the number of individuals who voted as well as unused and spoiled ballots. Between the two sections of the law, a poll clerk must account for ballots supplied, ballots used—including spoiled and lost ballots—ballots unused, and voters who voted. This accounting of ballots is also referred to as ballot reconciliation.

By Voting Type and Election Type

In the abovementioned sections of state law, the use of the terms poll clerk and precinct suggest that ballot reconciliation is performed by a clerk at a precinct, which only occurs on election day. As for election type, Title 7 of the S.C. Code of Laws applies to all types of elections—primary, general, special, and runoff. As such, ballot reconciliation is required to be performed for all types of elections. Because these worksheets are intended to ensure all valid ballots in an election have been cast, they are to be completed prior to a county’s certification—a statement by the county’s board of canvassers that election results are a true and accurate accounting of all votes cast in a particular election.

Overview of the Ballot Reconciliation Worksheet

The SEC’s ballot reconciliation worksheet is intended to be used by poll clerks to document, by precinct, the total ballots supplied, used, unused, and voters who voted. This worksheet accounts for these required components and contains two formulas, which are meant to ensure the appropriate values reconcile with each other. The following describes each section of the worksheet and the terms used.

Ballot Reconciliation Worksheet Top Portion

The top three-fourths of the worksheet contains 11 rows labeled A–K to record ballots supplied, used, and not used and voters checked in. Note, the worksheet accounts for voters who voted in the section “Voters Checked In,” as only voters who voted are checked in at a polling location. Specifically, rows A–K include the following:

ROW	ACCOUNTS FOR	INCLUDES
A	Ballots Supplied	Ballot Cards
B		Hand-Marked Paper Ballots
C		Additional Ballot Cards
D		Additional Hand-Marked Paper Ballots
E	Ballots Used	Ballots Scanned
F		Provisional Ballots
G		Spoiled Ballots
H	Ballots Not Used	Ballot Cards
I		Hand-Marked Paper Ballots
J	Voters Checked In	Electronic Pollbook
K		Paper Poll List

Rows A–B are completed by county office staff, and rows C–K are completed by the poll clerk after the polls close. The terms used in the worksheet and referenced in the table above are defined below.

BALLOT CARD

The paper cardstock provided to a voter for the purpose of recording his vote selections using a ballot-marking device (definition below).

BALLOT-MARKING DEVICE

A piece of voting equipment that allows a voter to electronically select valid contest options and then produces a human-readable paper ballot. Ballots are not cast on this device.

HAND-MARKED PAPER BALLOT

A paper ballot marked by hand by a voter using a blue or black pen. A hand-marked paper ballot is used at the polling location for emergency voting, via an emergency ballot, and provisional voting, via a provisional or failsafe provisional ballot (definitions below).

EMERGENCY BALLOT

A hand-marked paper ballot used in the event the ballot-marking device is inoperable or otherwise unavailable. Generally, these ballots are cast at the polling location.

PROVISIONAL BALLOT

A hand-marked paper ballot used when a voter's eligibility to vote is challenged, which may occur, for instance, if he has already received a ballot in the mail but insists on voting at a polling location.

FAILSAFE PROVISIONAL BALLOT

A hand-marked paper ballot used when a voter has moved from one precinct to another within the same county and failed to update his address or has moved from one South Carolina county to another within 30 days of the election.

Provisional and failsafe provisional ballots are not counted on election day. Instead, they are stored in individual sealed envelopes and kept separate from ballots that have been cast; these are the envelopes referred to in row F on the worksheet. After the polls close but prior to certification, the voter’s eligibility is reviewed, and a determination is made to either accept or reject these ballots based on this review by the county board of canvassers. Accepted ballots are then counted.

SCANNER/DS200

A piece of voting equipment used to read the voter selections from a ballot card or a hand-marked paper ballot. Ballots are cast on this device.

SPOILED BALLOT

A ballot that has been defaced or marked in error. For example, a voter may make a selection by mistake and then return the ballot to a poll clerk for a second ballot. The term “spoiled” is then written on the back of the ballot and retained for records. State law also refers to a spoiled ballot as a soiled, marred, and defaced ballot.

ELECTRONIC POLLBOOK

A piece of election equipment in the form of a tablet that contains the electronic version of the voter registration list, which is used to determine whether a person is eligible to vote in an election and in the precinct. These pollbooks also have the ability to capture a voter’s signature, which is evidence that a voter took the voter’s oath. Ballots are not cast on this device.

PAPER POLL LIST

A form containing the voter’s oath and signatures of voters who have taken the voter’s oath. Paper poll lists are used when the electronic pollbooks are not available or when voters must be checked in manually.

Ballot Reconciliation Worksheet Bottom Portion

The bottom one-fourth of the worksheet contains the reconciliation portion, which is also to be completed by the poll clerk. Line 1, as follows, is intended to reconcile the number of used and unused ballots with the total ballots supplied.

Line 1: Total 2 Total 3 Total 1
 (Ballots Used) + (Ballots Not Used) = (Ballots Supplied)

Line 2 below is intended to reconcile the number of voters checked in with the number of ballots used.

$$\text{Line 2:} \quad \begin{array}{c} \text{Total 4} \\ \text{(Voters Checked In)} \end{array} + \begin{array}{c} \text{G} \\ \text{(Spoiled Ballots)} \end{array} = \begin{array}{c} \text{Total 2} \\ \text{(Ballots Used)} \end{array}$$

Beneath the reconciliation formulas, there is a space to address any issues, including ballots that were lost or unscanned.

Worksheet Color Coding

For ease of completion, ballot reconciliation worksheets are meant to be printed in color. Four different colors are used for Totals 2 through 4 as well as for spoiled ballots:

Color	Corresponds to	
None	Total 1	Ballots Supplied
Yellow	Total 2	Ballots Used
Blue	Total 3	Ballot Not Used
Orange	Total 4	Voters Checked In
Green	Row G	Spoiled Ballots

Each color at the top of the worksheet has a corresponding color at the bottom, where reconciliation is performed. These colors are meant to assist the user in transferring the data from the top to the correct field at the bottom. It is important to note the color yellow for Total 2 and the color orange for Total 4 can often appear similar in appearance when printed.

Sample and Results

We reviewed a random sample of ballot reconciliation worksheets from the November 2022 General Election for Charleston County to determine if they were adequately completed and reconciled. For this election, the county completed its worksheets by polling location and precinct (see Appendix A). Per S.C. Code §7-13-1150, ballot reconciliation worksheets are to be completed by precinct. However, since counties, at times, consolidate multiple precincts into a single polling location, we conducted our analysis by polling location.

For the November 2022 General Election, the county had 98 polling locations. The random sample included 62 of 98 polling locations, and the results were calculated at a 99% confidence level with a margin of error of ± 10 percentage points. Therefore, these results can be generalized about all Charleston County polling locations during the 2022 General Election.

For this review, the term “completed” meant rows C–K contained values. If a field in rows C–K was blank, zero was assumed where logical unless zeros were used elsewhere on the worksheet. The total boxes for each section (Total 1, Total 2, Total 3, and Total 4) were not included within the definition of completed, as they were a separate method of counting ballots and voters to what was presented in rows C–K. Additionally, the term “reconciled” meant the addition in Line 1 and the resulting value in N equaled the value in Total 1 (Total Ballots Supplied), and the addition in Line 2 and the resulting value in Q equaled the value in Total 2 (Total Ballots Used).

Figure 2 below provides a diagram of what was considered completed and reconciled on the worksheet. Note, information in red was added to the diagram to distinguish otherwise unidentified fields and sections of the worksheet.

Figure 2: Worksheet Diagram for the Definition of Completed and Reconciled

County _____ Precinct _____ Date _____

Ballots Supplied		
A	Ballot Cards (Completed by County Office)	
B	Hand-Marked Paper Ballots (Completed by County Office) (Emergency/Provisional + Failsafe Provisional)	
C	Additional Ballot Cards	
D	Additional Hand-Marked Paper Ballots (Emergency/Provisional + Failsafe Provisional)	
Total 1		

Ballots Used		
E	Ballots Scanned (Ballot Cards and Emergency Ballots) (Number displayed on the Scanner/DS200)	
F	Provisional Ballots (Hand-Marked Paper Ballots/Envelopes)	
G	Spoiled Ballots (Ballot Cards + Hand-Marked Paper Ballots)	
Total 2		

Ballots Not Used		
H	Ballot Cards	
I	Hand-Marked Paper Ballots (Emergency/Provisional + Failsafe Provisional)	
Total 3		

Voters Checked In		
J	Electronic Poll Book (EPB)	
K	Paper Poll List (Include Provisionals NOT entered in the EPB) (DO NOT Include Curbside Poll List)	
Total 4		

Line 1 Total 2 **L** + Total 3 **M** = **N** (Should equal Total 1)

Line 2 Total 4 **O** + G **P** = **Q** (Should equal Total 2)

Explain any discrepancies:

Are you returning any Emergency ballots that have not been scanned? Yes ☐ No ☐
(Do NOT include Provisional or Failsafe Provisional ballots)

Poll Clerk Signature: _____ Time: _____

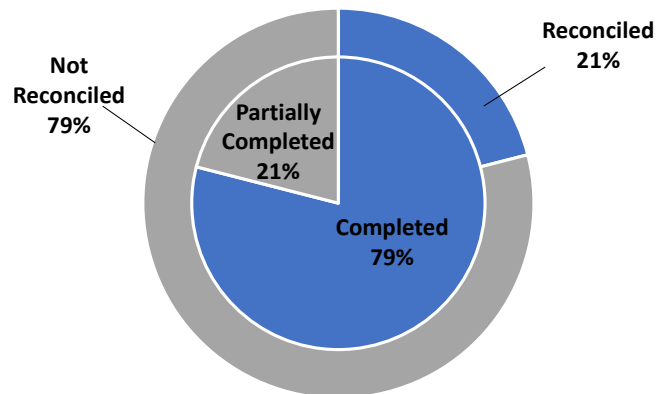
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**every vote matters.
every vote counts.**

Source: S.C. State Election Commission

For Charleston County, ballot reconciliation worksheets for 79% (49/62) of its polling locations were completed, and 21% (13/62) were reconciled. Figure 3 below provides a breakdown of the completion and reconciliation status of these worksheets.

Figure 3: Overall Completion and Reconciliation Status of the Worksheets



Source: Analysis of Charleston County's Ballot Reconciliation Worksheets, 2022 General Election

Completion of the Worksheets

Of the 21% (13/62) of worksheets that were partially completed, 8 worksheets contained 1 or more rows that were blank, but other rows on the worksheets contained zeros or slashes indicating zero. The most common rows left blank were rows C (Additional Ballot Cards) and D (Additional Hand-Marked Paper Ballots). If the user had written zeros in all blank rows, then 92% (57/62) of the worksheets would have been completed. For the remaining five partially completed worksheets:

- 2% (1/62) were missing a value in row E (Ballots Scanned).
- 2% (1/62) were missing values in rows E and I (Hand-Marked Paper Ballots Not Used).
- 2% (1/62) were missing values in rows E and H (Ballot Cards Not Used).
- 3% (2/62) were missing values in rows J (Voters Checked In/Electronic Pollbook) and/or K (Voters Checked In/Paper Poll List).

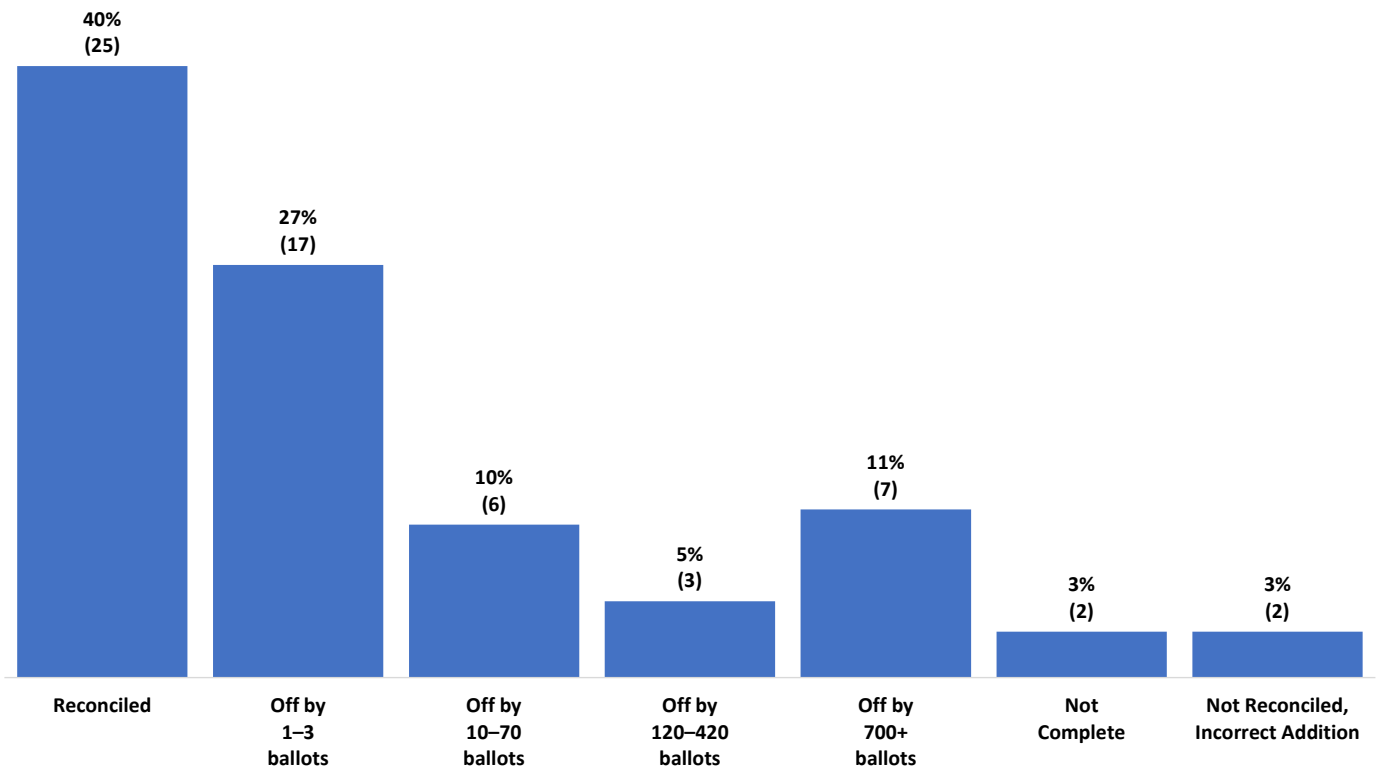
The State Election Commission's (SEC) instructions for the worksheet did not require a user to fill all rows. However, as a third-party reviewer, it was difficult to discern if an empty row was an oversight or intentional. Requiring a value for all rows on the worksheet will likely improve clarity to all users. In December 2024, a recommendation was made to the SEC to require a value, even if zero, be written in each of the worksheet's rows.

During the progression of this audit, an updated version of the ballot reconciliation worksheet was released for county use. In the new version, minor changes were made such as enriching the colors used to distinguish the totals and including instructions for all rows to have a value, even if zero.

Reconciliation of Line 1

As for reconciliation, 40% (25/62) of the worksheets in our sample reconciled in Line 1, 56% (35/62) did not, and 3% (2/62) were not completed. Figure 4 below offers a breakdown of Line 1.

Figure 4: Reconciliation Status of Line 1



Note: Off by 1% due to rounding.

Source: Analysis of Charleston County's Ballot Reconciliation Worksheets,
2022 General Election

One of the main issues that affected Line 1's reconciliation was an incorrect starting number of ballots in either row A (Ballot Cards Supplied) or row B (Hand-Marked Paper Ballots Supplied). For Line 1, of the 35 worksheets that did not reconcile, 22 of them were likely affected by this issue. Specifically, 17 worksheets likely had an incorrect starting number of ballot cards, and 5 likely had an incorrect starting number of hand-marked paper ballots.

For the worksheets with an incorrect starting number of ballot cards, this is likely the result of the ballot packaging process, which weighs rather than counts the ballots, and thus, the packs of ballots could be off by $\pm 2\%$. For instance, a package of 250 could be over or under by as many as 5 ballot cards. If county staff and poll clerks count the ballot packs and not the individual ballot cards, the values in row A and row C could be incorrect and therefore cause Total 1 (Total Ballots Supplied) to be incorrect. Thus,

these worksheets most likely had an incorrect Total 1 to start with, which caused Line 1 to not reconcile. Per a county election official, this issue was not known during the 2022 November General Election.

According to a county election official, while county staff do not count blank ballot cards, poll clerks are trained to count ballot cards, when a new pack is opened, to verify the number of ballots supplied is accurate. It is important to note, as of 2024, the county has a DS950, which is a high-speed scanner that can count 280 14-inch ballots per minute. This scanner could be used to count blank ballot cards to ensure the stated package amount is correct. Having individuals from the county office count the individual ballot cards supplied and then having the poll clerk verify the amount noted by the county office in row A and row C will likely ensure the number of ballot cards supplied is accurate.

For one of the worksheets that likely had an incorrect starting total of hand-marked paper ballots, the worksheet would still not have reconciled due to the clerk not correctly transcribing Total 3 (Total Ballots Not Used) to Line 1. Thus, if the worksheet had the correct starting total for hand-marked paper ballots supplied (row B) and the clerk had accurately transcribed Total 3 to Line 1, then Line 1 would have reconciled. This transcription issue also caused another worksheet not to reconcile in Line 1.

According to a county election official, as of the November 2024 General Election, poll clerks and assistant poll clerks are trained on the ballot reconciliation worksheets using multiple hands-on exercises. Continued hands-on poll clerk training that emphasizes which values to transcribe from the top portion of the worksheet to Lines 1 and 2 may prevent issues related to transcription.

Another issue which affected two worksheets was a data entry error in row E (Ballots Scanned), which caused Total 2 (Total Ballots Used), and subsequently Line 1, to be incorrect. If the clerks had written the correct value into row E, then Total 2 would have been correct, and Line 1 would have reconciled. As stated previously, continued use of hands-on exercises during poll clerk trainings may prevent this type of issue.

Of the worksheets, 11 did not correctly account for provisional ballots, a type of hand-marked paper ballot. For example, on one worksheet, there were 131 provisional ballots supplied according to row B (Hand-Marked Paper Ballots Supplied). However, according to the Ballots Used section, no provisional ballots were used at this location (row F), and none were counted as unused in row H (Hand-Marked Paper Ballots Not Used). Thus, if the 131 unused provisional ballots had been appropriately accounted for in row H, this worksheet would have reconciled in Line 1. A similar situation occurred on the other worksheets affected by this issue. However, for seven of the worksheets with this issue, there were additional issues that prevented them from reconciling, including:

-
- Four worksheets did not correctly account for the supplied ballot cards in row E (Ballots Scanned), row H (Ballot Cards Not Used), or both.
 - One worksheet had a data entry error in row E (Ballots Scanned) and likely had an incorrect starting number of ballot cards supplied (included in the 17 mentioned above).
 - One worksheet did not correctly add rows E–G to determine Total 2's value at the top of the worksheet.
 - One worksheet did not account for the unused ballot cards (row H).

Emphasizing how to account for provisional ballots throughout the worksheet during its poll clerk hands-on training exercises may prevent these issues.

Lastly, for the two worksheets considered incomplete:

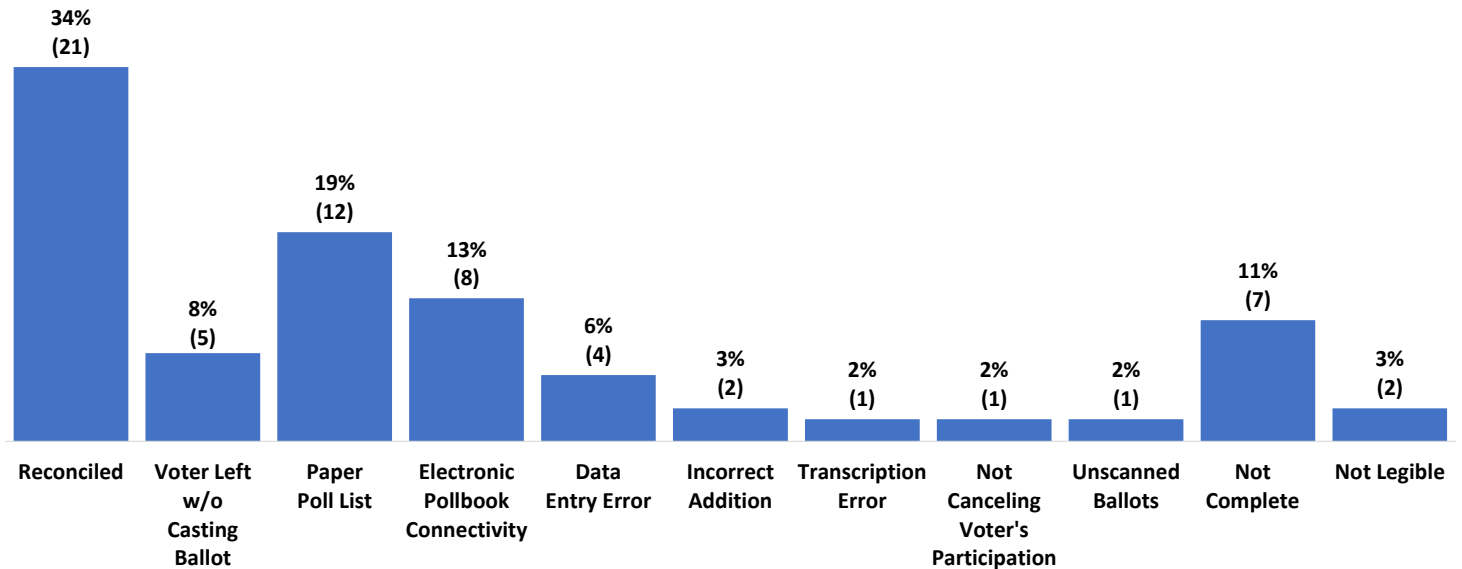
- One worksheet did not transcribe Total 3 at the top of the worksheet to Line 1. However, even if it had been transcribed, the line would not have reconciled due to the provisional ballots not being accurately accounted for.
- One worksheet left Line 1 completely blank. However, based on the numbers present on the worksheet, the line would not have reconciled even if it had been completed.

According to a county election official, as of the November 2024 General Election, its ballot reconciliation worksheet review process consists of office staff checking the worksheets against the results tapes from the election equipment. If issues arise, the staff consult with the poll clerks to determine the cause. Ensuring the worksheets are adequately completed during this review may prevent issues related to incompleteness. Additionally, checking returned election materials, such as provisional ballot envelopes, during its worksheet review process may allow for worksheet errors, such as those related to the provisional and spoiled ballots, to be corrected.

Reconciliation of Line 2

As for Line 2, 34% (21/62) of the worksheets in our sample were reconciled, 52% (32/62) were not, and 15% (9/62) were either incomplete or illegible. Figure 5 below offers a breakdown of Line 2.

Figure 5: Reconciliation Status of Line 2



Note: Off by 3% due to two worksheets having two issues.

Source: Analysis of Charleston County's Ballot Reconciliation Worksheets, 2022 General Election

Thirty-two worksheets did not reconcile in Line 2. Of these, two worksheets contained two separate issues. These issues are broken down below:

# OF WORKSHEETS	MAIN ISSUE	ISSUE DESCRIPTION
5	Voter Left Without Casting Ballot	<p>These worksheets had more voters checked in than ballots voted. While not certain, it is possible that voters left the polling location after checking in without casting their ballots. When a checked in voter receives a ballot but does not cast it, there are three scenarios that may occur: a voter may return the ballot to a poll manager, abandon the ballot during the voting process, or leave the precinct with the ballot. Per the 2022 General Election poll manager handbook, when a voter:</p> <ul style="list-style-type: none"> Returns his ballot, the poll manager needs to spoil the ballot and cancel the voter's participation in the electronic pollbook (EPB); this would not cause a reconciliation imbalance. Abandons his ballot during the voting process and does not inform the poll managers, they must assume the voter intended to cast the ballot. Two poll managers must place the ballot in the Scanner/DS200. This would not cause a reconciliation imbalance. Leaves with his ballot, the poll manager who is the exit monitor—the poll manager who instructs voters on how to scan their ballots and provides “I Voted” stickers—needs to alert the voter. However, it can be difficult to always know if a checked in voter has left with his ballot or stop a voter from taking his ballot; this could cause a reconciliation imbalance. Under this circumstance,

		noting such a situation in the notes section on the worksheet is the only option to the poll clerk.
12	Not Using Paper Poll List	These worksheets were likely off due to the paper poll list—a paper version of the poll list to be used when EPBs are not available or when voters must be checked in manually—not being properly utilized. Poll clerk training that emphasizes when and how to properly use the paper poll list and apply it to the ballot reconciliation worksheet may prevent this issue.
8	Electronic Pollbook Connectivity Issue	<p>These worksheets were likely off due to EPB connectivity issues. On one worksheet, for example, based on the November 2022 General Election turnout data—data logged by the EPB host server that shows the count of voters who were issued voting credit—the total voters checked in was overstated by one. Using the turnout data, Line 2 reconciled on the worksheet. In fact, correcting the voters checked-in numbers to reflect the turnout data caused all worksheets with this issue but one to reconcile. The remaining worksheet still did not reconcile due to the paper poll list not being used correctly.</p> <p>It is important to note that EPBs can have connectivity issues at polling locations, which can, at times, cause devices to display incorrect totals for voters checked at the polling location. However, the accurate log of checked-in voters is recorded in the turnout data. It is uncertain whether the impact of these connectivity issues was known at the time of this election. Reviewing the host server turnout report during the worksheet review process may prevent these types of issues.</p>
4	Data Entry	These worksheets had data entry errors. For example, on one worksheet, the poll clerk incorrectly recorded the values in row E (Ballots Scanned) and row J (Voters Checked In/Electronic Pollbook). This was verified by reviewing the turnout report and Scanner/DS200 data. Using the corrected data, Line 2 reconciled. Similar data entry errors occurred on the other worksheets affected by this issue. Continued hands-on training exercises with the poll clerks may prevent errors related to data entry.
2	Incorrect Addition	These worksheets did not reconcile due to incorrect addition, specifically Total 2 (Total Ballots Used) was added together incorrectly in the top portion of the worksheets. If the total had been added together correctly, Line 2 would have reconciled for both worksheets. Again, hands-on training exercises with the poll clerks may prevent this issue.
1	Transcription	For this worksheet, the poll clerk did not correctly transcribe the spoiled ballots (row G) to Line 2. If the spoiled ballots had been correctly transcribed, the line would have reconciled. Again, poll clerk training that emphasizes which values to transcribe to Lines 1 and 2 may prevent this kind of issue.
1	Not Canceling Voter's Participation	This worksheet stated, in the explanation section, that a ballot was spoiled after issuance because the voter had an absentee ballot. In a situation such as this, the EPB should have indicated that the voter was issued and returned an absentee ballot. However, if the voter claims not to have returned it, or if the EPB only denoted that an absentee was issued but not returned, the poll worker is allowed to check the voter in and issue a provisional ballot. However, since the ballot was spoiled and the voter did not cast a provisional ballot at the polling location, the voter's participation also needed to be canceled on the EPB in order for the line

		to reconcile. Training poll workers on when and how to cancel a voter's participation in the EPB may prevent this issue.
1	Unscanned Emergency Ballots	This worksheet likely did not reconcile due to unscanned emergency ballots. On the worksheet, there was one more voter checked in than ballots voted. However, the clerk indicated at the bottom of the worksheet that there were emergency ballots— hand-marked paper ballots used in the event the ballot-marking device is inoperable or otherwise unavailable—that had yet to be scanned. If the clerk did in fact return one unscanned ballot, the worksheet may have reconciled. Checking returned election materials like unscanned ballots during the worksheet review process may prevent this issue.
7	Not Complete	Six worksheets only completed one field in Line 2 and left the rest of the line blank. The remaining worksheet left Line 2 completely blank. However, based on the numbers present, Line 2 would not have reconciled on any of the worksheets even if it had been completed.
2	Not Legible	Two worksheets were not legible in Line 2 because one or multiple values were not readable in the line. Even if they had been legible, the line still would not have reconciled according to the numbers available on the worksheets. Again, checking that worksheets are completed and legible during the worksheet review process may prevent these issues.

Adequately completing and reconciling the ballot reconciliation worksheets for each polling location may give greater assurance that the results include all valid ballots cast.

Recommendations

1. The Charleston County Voter Registration and Elections Office should count individual ballot cards prior to elections to ensure the correct number of ballot cards are supplied.
2. The Charleston County Voter Registration and Elections Office should, during its poll clerk trainings, place emphasis on:
 - Accurately transcribing values from the rows in the top portion of the worksheet to the reconciliation lines.
 - Accounting for provisional ballots.
 - Proper use of the paper poll list.
 - Canceling voter participation in the electronic pollbook.
3. The Charleston County Voter Registration and Elections Office should, during its worksheet review process, check and correct, where necessary and prior to certification, the worksheets:
 - For completion and legibility.
 - Against the returned election materials, such as provisional ballot envelopes and unscanned emergency ballots.
 - Against the host server turnout report data for voters checked in.

Appendix A: Objective, Scope, and Methodology

This report provides the results of our compliance audit of the Charleston County Voter Registration and Elections Office and its use of the ballot reconciliation worksheet. We conducted this audit under the provision of S.C. Code §7-3-20(D)(3). The review period for the audit was for the November 2022 General Election, and the objective was to determine whether precinct ballot reconciliation worksheets from this election were adequately completed and reconciled. To conduct this audit, we used a variety of sources of evidence, including:

- Federal and state laws.
- S.C. State Election Commission (SEC) policies and procedures.
- SEC training materials.
- Interviews with and surveys of county election officials.
- Information from South Carolina and other state agencies as well as the U.S. Election Assistance Commission.
- Contracts and information from Election Systems & Software and its vendor, Printelect.
- Ballot reconciliation worksheets.

Criteria used to evaluate compliance was based on federal and state laws and agency policies, procedures, and training material. We reviewed internal controls in several areas, including SEC policies and procedures; county policies, procedures, and practices; and agency training. Our findings are detailed in this report.

Issue for Further Review

During our examination of the ballot reconciliation worksheets, we identified a potential legal compliance issue that requires further review. Specifically, in the November 2022 General Election, several counties consolidated multiple precincts into a single polling location.

Pursuant to S.C. Code §7-7-10, while counties are authorized to establish multiple polling places within a precinct, the statute does not grant authority to consolidate multiple precincts into a single polling location. Additionally, under S.C. Code §7-13-1150, ballot reconciliation worksheets must be completed at the precinct level.

Due to time constraints, we were unable to conduct a comprehensive analysis of this issue. However, it is briefly addressed here and is the reason our analysis was conducted by polling location rather than by individual precinct.

Appendix B: Charleston County Comments

Appendix B: Charleston County Comments

The Charleston County Board of Voter Registration and Elections (BVRE) acknowledges receipt of the final report, An In-Depth Review of Charleston County's Ballot Reconciliation Worksheets, and appreciates the South Carolina State Election Commission (SEC) Audit Division's dedicated effort to ensure accountability in election processes. The BVRE is committed to continuous improvement; however, upon review of the report, we respectfully present several concerns regarding the audit's methodology, scope, and the interpretation of findings.

It is our central belief that the findings regarding low reconciliation rates should not be viewed solely as a reflection of County-level training, but rather as symptomatic of systemic challenges common across all counties in South Carolina. The ballot reconciliation sheet is notoriously confusing for anyone who uses it; it is the one area at statewide workshops where even full-time election officials report difficulties. This form is a clear area that needs a fundamental revamp. We hope the audit is displaying this trend across the state so the SEC can look to make critical changes to its ballot reconciliation form. Any form used by temporary, volunteer poll clerks must be highly intuitive and designed at an elementary level, as the time afforded for detailed training on this specific topic is inherently limited due to the wide scope of other critical duties.

I. Concerns Regarding Scope and Methodology

The BVRE believes that two aspects of the report's methodology introduced inaccuracies and exceeded the audit's stated purpose.

A. Application of a Retroactive Standard for Worksheet "Completion"

The report defines "completion" by assuming that any blank field in rows C-K signifies an incomplete entry or an error. Using this measure, the audit determined that 21% of the County's worksheets were "partially completed."

BVRE Response: This conclusion is based on a standard that was not explicitly mandated for the November 2022 General Election. As the SEC notes in its report, its instructions for the worksheet did not require a user to fill all rows. Therefore, a blank was often an intentional notation for "none," which was the prevailing interpretation used by the BVRE when clerks came back to the office with the sheets. We note that the report itself confirms the possibility of this flawed assumption by stating that if clerks had written zeros in all blank rows, the reported completion rate would have risen from 79% to 92%.

Arbitrating against the County based on a third-party reviewer's difficulty in interpreting intentionality—when no clear instruction for completion was violated—is the application of a retroactive standard. Judging compliance based on a more stringent interpretation risks a misleading representation of the County's performance for completion.

B. Commentary on Precinct Management

The report includes commentary in Appendix A regarding the legal compliance of the County's practice of consolidating multiple precincts into a single polling location.

BVRE Response: This discussion, we believe, is considered outside the scope of the audit, which was intended to assess the completion and reconciliation of worksheets.

Furthermore, the practice of precinct consolidation in Charleston County has a long legislative history that precedes this Board's authority and occurred while the current, well dated S.C. Code §7-13-1150 and §7-7-10 were in effect. Prior to 1992, the General Assembly—the body responsible for enacting the code—consistently designated consolidated polling places. For example, Act 409 of 1984 established only 82 polling places for 125 precincts, meaning over 57% of the precincts were consolidated (See also Act No. 273 of 1984 and Act No. 357 of 1982). The consistent actions of the Legislature for decades demonstrate an authoritative interpretation that consolidation is compatible with the requirements of the statute. The ballot reconciliation sheet should be updated to account for this reality, as the required accounting for ballots is still being performed.

II. External and Systemic Causes of Reconciliation Issues

The report frequently attributes reconciliation discrepancies to County processes. However, the BVRE maintains that the most critical drivers of error originate from vendor processes (which were not known in 2022) and the worksheet itself.

A. Flaws Originating from Ballot Card Packaging/Equipment

The report cites incorrect starting numbers of ballot cards (Row A) as a primary cause of Line 1 discrepancies (p. 10), potentially implying a County error. However, this issue stems from the vendor's (Printelect/ES&S) packaging methodology, which weighs rather than counts ballots, allowing for a $\pm 2\%$ variance (e.g., a 250-pack could vary by ± 5).

BVRE Response: This initial discrepancy is inherent to the ballot supply and is not a failure of County processes. The report frequently cites incorrect starting numbers of ballot cards (Row A) as a primary cause of Line 1 discrepancies, attributing this to county error. However, this issue stems from the vendor's (Printelect/ES&S) packaging method, which weighs rather than precisely counts ballots, allowing for a $\pm 2\%$ variance (e.g., a 250-pack could vary by ± 5 cards). During the period of this report, we were unaware that vendors weighed their ballot stacks; this was a fact discovered by the SEC during its investigation into why starting counts were inconsistent. Expecting volunteer poll clerks or limited office staff to hand-count hundreds or thousands of blank ballot cards per precinct is impractical, highly time-consuming, and introduces new risks through manual handling and repackaging—as well as manual errors. The report recommends using the DS950 high-

speed scanner for counting (p. 11), but this equipment was not available in 2022, and even scanners have a margin of error.

Additionally, the report's analysis of Line 2 issues (e.g., EPB connectivity, p. 13) highlights equipment limitations beyond county control, yet these are framed as resolvable through county training alone (see below in "Conclusion"). It has been reported as an issue statewide since 2022.

B. Fundamental Flaws in the SEC-Designed Reconciliation Worksheet

The complexity in the state-mandated ballot reconciliation worksheet are significant factors contributing to the transcription and data entry errors cited in the report.

1. **Terminology Discrepancy:** The worksheet uses generic terms (e.g., "Hand-Marked Paper Ballots") that do not align with the specific, practical terminology used in Poll Clerk training (e.g., "F" could state "Provisional Envelopes"). This forces temporary clerks to mentally cross-reference and translate terms, which increases the probability of data error.
2. **Complex and Inconsistent Formulas:** The reconciliation formulas are not intuitive. They require clerks to transfer values from various parts of the page, mixing labeled totals with single row references. This design demands unnecessary mental effort from temporary poll workers who have many other critical duties, directly contributing to the "transcription issue" cited in the report.
3. **Low-Contrast Design:** The report noted that the critical color coding for Total 2 (Yellow) and Total 4 (Orange) often appear similar when printed. Relying on such low-contrast distinctions for key calculation fields creates a high-probability failure point, especially given the varied lighting conditions in polling locations. This design flaw was ultimately corrected at the SEC level.

Conclusion

The BVRE respectfully suggests that the audit's findings, particularly the commonality of errors across multiple counties, point toward a critical need to evaluate and improve the state-level tools and standards. Charleston County is committed to addressing our training and process gaps, such as piloting simplified worksheet mockups. We also conduct a quick review of each ballot reconciliation sheet when clerks return on Election Night with their supplies. It is worth noting that a small portion of clerks require assistance at that time due to confusion with the worksheet's layout. However, we urge the SEC to recognize the inherent design flaws in the ballot reconciliation worksheet and to consider ballot card supply factors as potential primary drivers of the reported discrepancies. A balanced approach that includes more training and fixes the tools provided to the counties will yield greater, more effective improvement across the state.

Also, we appreciate the dedicated effort of the Audit Division and the focus of their team. Their recommendations are valuable; however, it is essential that these suggestions are not viewed in a vacuum but are implemented with the mindset of what the present realities are for election offices across the state.

The conditions under which this audit was performed—with a 100% focused team, ample time, and dedicated resources—cannot be directly compared to the high-pressure, time-constrained environment faced by county election offices.

Following a general election, County Election Officials have less than two days to navigate a multitude of time-critical processes, including, but not limited to: reviewing provisional ballots; performing mandated hand count audits; reconciling all equipment and data with the SEC; reviewing and paying thousands of poll workers; and preparing for certification. Furthermore, South Carolina is among the quickest states in the nation in completing post-election processes, placing significant strain on county offices given the sheer volume of tasks required in a short timeframe.

Acknowledging this difference is vital for a fair interpretation of the results. Any recommendations must be grounded in this operational reality—focusing on improving the state-level tools and systems (such as reworking the ballot reconciliation sheet) that maximize effectiveness under real-world constraints, rather than treating local operations as if they function in isolation or without limitations.