

# **SOUTH CAROLINA**

## ELECTION COMMISSION

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October 2025

### AN IN-DEPTH REVIEW OF PICKENS 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, 95% of Pickens County's ballot reconciliation worksheets were completed, and 17% were reconciled. On the worksheets that were partially completed, this was due to the lack of a requirement from the State Election Commission (SEC) to fill every field, even if zero. For the 83% of the county's worksheets that were not reconciled, this was likely due to limited poll clerk training at the time.

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 training exercises and assessments. Additionally, the county reviews these worksheets on election night with clerks, requiring explanations for any imbalances on the worksheet. Adequately completing and reconciling these worksheets for each polling location may give greater assurance that all valid ballots were included in the election results.

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## 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)	
<b>Total 1</b>		

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)	
<b>Total 2</b>		

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

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)	
<b>Total 4</b>		

**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

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## 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.

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## 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.

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



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

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

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.

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## Sample and Results

We reviewed a random sample of ballot reconciliation worksheets from the November 2022 General Election for Pickens County to determine whether they were adequately completed and reconciled. For this election, the county completed its worksheets by polling location, and all were available for review. Per S.C. Code §7-13-1150, ballot reconciliation worksheets are to be completed by precinct (see Appendix A). However, since counties, at times, consolidate multiple precincts into a single polling location, we conducted our analysis by polling location. It is important to note that State Election Commission (SEC) training provided to the counties did not consistently state this requirement. For this election, the county had 54 polling locations. The random sample included 41 of the 54 polling locations. After selecting the polling locations, there was one location that contained two worksheets—one for each precinct in the polling location; in this instance, one of the worksheets was randomly selected and included in the analysis. The results were calculated at a 99% confidence level with a margin of error of  $\pm 10$  percentage points. Therefore, these results can be generalized about all of Pickens County’s 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 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 \_\_\_\_\_

<b>Ballots Supplied</b>		
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)	
<b>Total 1</b>		
<b>Ballots Used</b>		
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)	
<b>Total 2</b>		
<b>Ballots Not Used</b>		
H	Ballot Cards	
I	Hand-Marked Paper Ballots (Emergency/Provisional + Failsafe Provisional)	
<b>Total 3</b>		
<b>Voters Checked In</b>		
J	Electronic Poll Book (EPB)	
K	Paper Poll List (Include Provisionals NOT entered in the EPB) (DO NOT Include Curbside Poll List)	
<b>Total 4</b>		

**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: \_\_\_\_\_

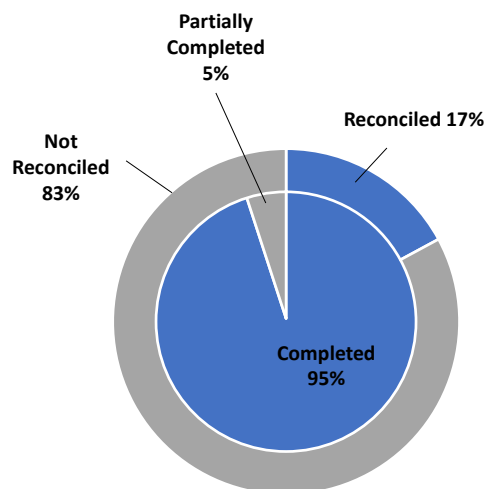
SEC FRM 1150-202208

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

Source: S.C. State Election Commission

For Pickens County, 95% (39/41) of its worksheets were completed, and 5% (2/41) were partially completed. Overall, the worksheets did not reconcile, with 17% (7/41) reconciled and 83% (34/41) that were not. Furthermore, of the worksheets that contained imbalances, 57% included a note from the poll clerk that attempted to explain the issue. Figure 3 below illustrates the overall completion and reconciliation status of these worksheets.

**Figure 3: Overall Completion and Reconciliation Status of the Worksheets**



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

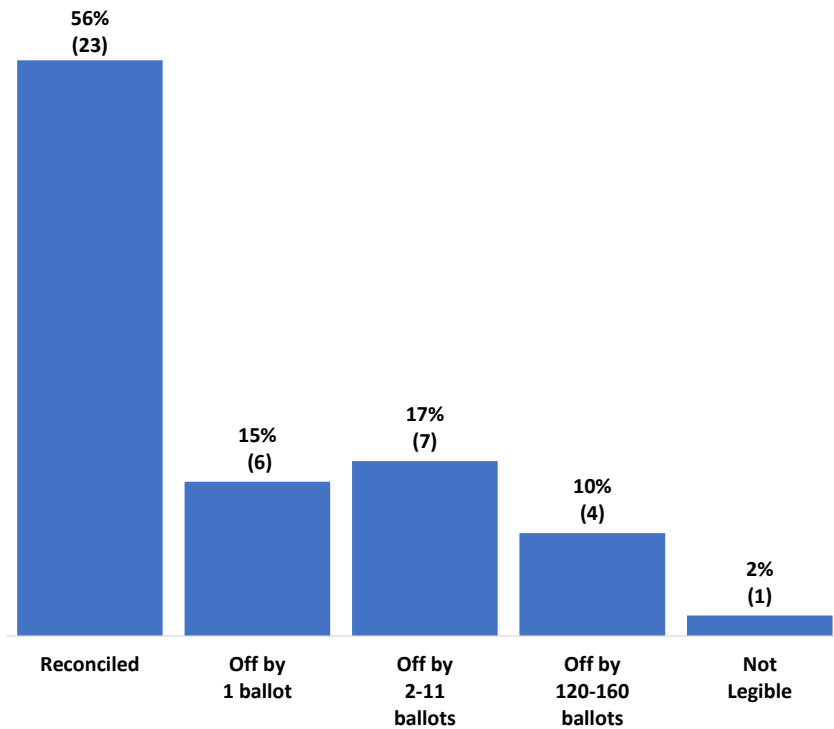
### Completion of Worksheets

For the worksheets that were partially completed, one or more fields were left blank, but other fields on the same worksheet contained zeros. The fields left blank were rows C (Additional Ballot Cards) and D (Additional Hand-Marked Paper Ballots). If the user had filled in zeros in these rows, then 100% (41/41) of the worksheets would have been completed. The SEC's instructions for the worksheet and training at the time 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 fields.

### Reconciliation of Line 1

As for reconciliation, 56% (23/41) of the worksheets reconciled on Line 1, 41% (17/41) did not, and 2% (1/41) were not legible. Of the sample, 15% (6/41) were off by 1 ballot, 17% (7/41) were off by 2–11 ballots, and 10% (4/41) were off by 120–160 ballots. Figure 4 below provides a breakdown of the reconciliation status of Line 1.

**Figure 4: Reconciliation Status of Line 1**



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

For the 13 worksheets off by 11 or fewer ballots, the issue appears to be a result of not counting individual ballot cards. It is important to note, the ballot card packaging process weighs rather than counts ballot cards and could, therefore, cause packages to be off by  $\pm 2\%$ ; 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 packages and not the individual ballot cards, the values in rows A and C could be incorrect and, therefore, cause Total 1 (Total Ballots Supplied) to be incorrect. Note, county staff and poll clerks were not instructed to count individual ballot cards at the time of this election.

Per a county election official, county staff do not count individual ballot cards before sending them out to the polling locations. According to the state's election system vendor, ballot cards are humidity and curl resistant, but the relative humidity may affect how the cards pass through the tabulators. The vendor's best practices advise to "leave unused...cards in their shrink wrap until they are needed." Despite these vendor suggestions, S.C. Code §§7-13-1150 and 7-13-1410 require ballot reconciliation. To reconcile the worksheets, counting ballot cards is necessary to ensure the number of ballots supplied is accurate due to the packing process. Steps to spoil a ballot can be followed in the event of issues due to handling.

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A county election official also stated that the office trains its poll clerks to count ballot cards and ensure the totals listed in row A and row B are correct. On 27% (11/41) of the worksheets, there was evidence that the poll clerk counted the blank ballot cards. The official further stated that, during the 2022 General Election, the county had six first-time clerks, including two who stepped in as clerks on election day with no formal poll clerk training due to an emergency. Furthermore, 13 of its clerks had only worked 1 prior election: the June 2022 Primary. This may have had an impact on some of its clerks' ability to count ballots cards as trained. Counting individual ballot cards by two different individuals—such as, in the office and again at the polling location by a clerk—will likely reduce miscounts in the number of ballots supplied.

On the 4 worksheets off by 120–160 ballots, all appeared to not account for unused hand-marked paper ballots on the worksheets. Additionally, one contained a transcription issue, and three contained ballot card counting issues, as described above. On one worksheet, for example, 160 hand-marked paper ballots were supplied (row B), but zero was written for both used provisional ballots—a type of hand-marked paper ballot (row F)—and unused (row I) hand-marked paper ballots. Per a county election official, the county did not provide additional training on the ballot reconciliation worksheets beyond what was provided by the SEC. It is important to note that, at the time of the 2022 General Election, the SEC did not provide ballot reconciliation hands-on training to the counties. Furthermore, the director had been in the position for less than one year. Since that election, the county has developed a detailed training that fully explains the worksheet and where to obtain the totals needed to complete it. This includes:

- Creating training examples—new for each training session—using actual numbers from the equipment as well as an assessment at the end of training.
- Providing an example of an acceptable explanation when there are imbalances.
- Notating corrections to ballot cards supplied by the office, including strikeouts and corrections.

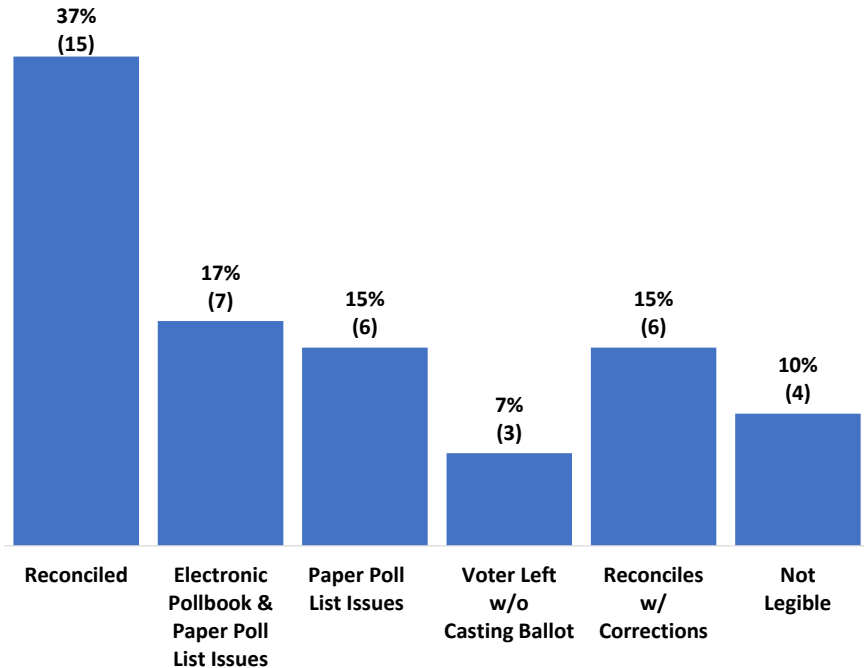
According to a county election official, since this election, it has conducted more than 20 elections, employing these training techniques. It is likely that these training efforts have resolved the county's previous issues with the clerk's count of ballot cards, transcription of values, and accounting for hand-marked paper ballots.

Lastly, one worksheet did not reconcile on Line 1 because it was not legible. The values in rows C–K as well as on Line 1 were written in such a way that made it difficult to determine what were the correct numbers. Per a county election official, the county has revamped its poll clerk check-in process on election night. It now includes reviewing the worksheets for any reconciliation imbalances; if found, counts are recalculated and, if needed, investigations are conducted to determine the issue. It is also likely that this new process identifies and corrects legibility issues.

## Reconciliation of Line 2

As for Line 2, 37% (15/41) of the worksheets reconciled, 54% (22/41) did not, and 10% (4/41) were not legible. Figure 5 below provides a breakdown of the reconciliation status of Line 2.

**Figure 5: Reconciliation Status of Line 2**



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

For the 22 worksheets that did not reconcile as written by the poll clerk, we corrected the worksheets with DS200/scanner data and turnout report data—data logged by the host server that shows the count of voters who were issued voting credit—to determine the source of any issues. Below is a description of the issues that caused these worksheets not to reconcile.

# OF WORKSHEETS	MAIN ISSUE	ISSUE DESCRIPTION
7	Electronic Pollbook Connectivity & Paper Poll List Issues	<p>These worksheets had more ballots voted than voters checked in due to electronic pollbook (EPB) connectivity issues and not using or counting signatures from the paper poll list.</p> <p>For example, one worksheet overstated the EPB count by one voter and understated the paper poll list voters checked in by three. 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 in at the polling location. However, the accurate log of checked-in voters is recorded in the turnout data. It is uncertain that the impact of these connectivity issues was known at the time of this election, and, therefore, training was not provided to</p>

		<p>counties that instructed to use the turnout report when reviewing and correcting the worksheets.</p> <p>For the undercount of three voters checked in, either three voters did not sign the paper poll list, or the count of signatures was not added to the worksheet. This became clear since the total ballots scanned (row E) matched the corrected EPB total for voters checked in (row J), but the provisional ballots used (row F) totaled three while the voters checked in on the paper poll list (row K) was zero; the latter two totals should equal in this instance. Six other worksheets were similar in this regard.</p> <p>Regarding the voters that checked in via the paper poll list, a county election official did recall EPB issues during this election that resulted in several clerks checking in voters via paper. During the county's review process then, it did not have enough staff to check these paper records to verify the voters checked in via paper. Since then, it has added staff to assist in this process.</p>
6	Paper Poll List Issues	These worksheets had more ballots voted than voters checked in due to not using or counting signatures from the paper poll list, as described above.
3	Voter Left Without Casting Ballot	<p>These worksheets had more voters checked in than ballots voted due to voters not casting ballots. This caused the worksheets to include at least one more voter checked in than ballots voted. 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"> <li>• Returns his ballot, the poll manager needs to spoil the ballot and cancel the voter's participation in the EPB; this would not cause a reconciliation imbalance.</li> <li>• 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. This would not cause a reconciliation imbalance.</li> <li>• 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 would 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.</li> </ul>
6	Miscellaneous Issues, Corrected Reconciled	These worksheets contained either an addition error, EPB connectivity issue, data entry error, or unscanned curbside ballots that when addressed, the worksheets would have reconciled.



4	Not Legible	Four worksheets contained illegible numbers, making it not possible to determine reconciliation for the line. For example, on one worksheet, the values for row H (Ballot Cards Used) and Total 2 (Total Ballots Used) were not written clearly. For three other worksheets, the number were also either unclear or contained multiple numbers for a single row. Without these amounts, it was not possible to determine reconciliation.
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It must be noted that the county's changes to its poll clerk training and election night check-in process that have been implemented since this election have likely remedied most of the issues noted above. However, reviewing the host server turnout report for the correct total of voters checked in on the EPB during the worksheet review process, prior to certification, can alleviate the miscounts due to connectivity issues. Also, comparing the paper poll lists signatures to the total on the worksheet may resolve issues related to counts from paper check ins.

## Recommendations

1. The Pickens County Voter Registration and Elections Office should ensure individual ballots cards are counted two times to confirm that the total ballots supplied is accurate.
2. The Pickens County Voter Registration and Elections Office should, during its worksheet review process, check its worksheets against the host server turnout report data and paper poll lists and make corrective edits, as needed, prior to certification

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# Appendix A: Objective, Scope, and Methodology

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This report provides the results of our compliance audit of the Pickens 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.

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## Issue for Further Review

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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.

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## Appendix B: Pickens County Comments

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**BOARD OF VOTER REGISTRATION AND ELECTIONS**

October 16, 2025

Dear SEC Audit Division:

Pickens County Voter Registration and Elections greatly appreciates the SEC Audit Division's efforts to conduct an audit of the Ballot Reconciliation Worksheets from the November 2022 Statewide General Election. Having received the final report on Oct. 13, 2025, we would like to provide the following information:

1. The results of this Ballot Reconciliation Audit *do not indicate* any discrepancies or anomalies in the election results as certified by the Pickens County Board of Canvassers for the November 2022 Statewide General Election.
2. Pickens County Voter Registration and Elections is dedicated to continuous improvement. We acknowledge that a reconciliation rate of 17% meets neither our own internal standards nor the external expectations of the State Election Commission. We appreciate that the audit report recognizes:
  - a. the concerted efforts Pickens County has made to develop in-depth, hands-on training for Clerks, including practice examples and scenarios, and the significant changes Pickens County has made to the Clerk election night check-in process (p. 1 and p. 11);
  - b. discrepancies or lack of clarity in SEC-provided materials and instructions regarding polling locations and precincts (p. 7), use of zeros in certain rows of the worksheet (p. 9), and pre-counting of individual ballot cards (p. 10);
  - c. Pickens County's use of first-time Clerks and two individuals without Clerk training who stepped in due to emergency situations (p. 11); and
  - d. that at the time of this election, the SEC did not provide hands-on training for ballot reconciliation (p. 11).
3. The report highlights several issues that affected reconciliation. Among them are Electronic Pollbook Connectivity and Paper Poll List Issues (p. 12-14).
  - a. Electronic Pollbook Connectivity issues were significant in this election—not only in South Carolina but across the nation. The South Carolina General Assembly Legislative Audit Council report released in January 2024 and titled *A Review of the South Carolina Election Process* discusses these connectivity problems and their significance on pages 67-68 of its review.
    - i. The SEC Audit Division report regarding Pickens County Ballot Reconciliation Worksheets states, "[T]raining was not provided to counties that instructed to use the [EPB] turnout report when reviewing and correcting the worksheets" (p. 12-13).
    - ii. Pickens County Voter Registration and Elections staff do believe that training in the use of these turnout reports—in addition to training on how to correct unreconciled Ballot Reconciliation

Worksheets—would have aided us in the post-election Ballot Reconciliation Worksheet review process.

- b. How to use paper/emergency poll lists *and* EPB data in order to reconcile was not included as part of SEC trainings provided to county-level officials or in Clerk training materials prior to the time of this election. We appreciate the additional specification that “During the county’s review process then, it did not have enough staff to check these paper records to verify the voters checked in via paper” (p 13), as staffing circumstances continue to affect election night and post-election processes.
  - i. Since the November 2022 election, Pickens County has intentionally and deliberately included as part of its Clerk training: how to properly document voters using the Paper Voter Registration List (PVRL), how to collect emergency poll list signatures so that voters and the numbers of voters recorded on the PVRLs correspond to the number of signatures on the emergency poll list, and how to properly calculate voters checked in electronically and by paper such that Ballot Reconciliation Worksheets are complete and reconciled.
- 4. Of all the information provided in the report, the one area we did not see addressed was how Clerks and counties should navigate an unreconciled Ballot Worksheet when there are significant problems with scanner jams that result in discrepancies between the number of voters checked in on the electronic pollbooks and the number of ballots scanned—subsequently affecting the ability to reconcile. We would welcome future guidance for these situations.

We thank the SEC Audit Division for providing us with comprehensive feedback related to the Ballot Reconciliation Worksheets from the November 2022 Statewide General Election and recognize its efforts to provide recommendations for further improvement. We have extended invitations to the Audit Division to visit our office, work with us on election day(s), participate in and/or observe our in-person training sessions for poll workers, and observe at any of our early voting and election day locations. We do so again with the knowledge that *we are stronger when we work together*.

Kindest regards,



Dr. Amy T. Sams  
*Executive Director*