

SOUTH CAROLINA

ELECTION COMMISSION

October 2025

AN IN-DEPTH REVIEW OF YORK 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.

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Summary of Results

For the November 2022 General Election, 81% of York County's ballot reconciliation worksheets were completed, and 24% were reconciled. Of the 19% 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. For the worksheets that were not reconciled, adjustments to its poll clerk training, such as training clerks to count individual ballot cards, and its ballot reconciliation worksheet review process may improve the reconciliation of these worksheets. 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 York County to determine if they were adequately completed and reconciled. For this election, the county completed most of its worksheets by 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, York County had 88 polling locations. The random sample included 58 of 88 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 of York 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 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: _____

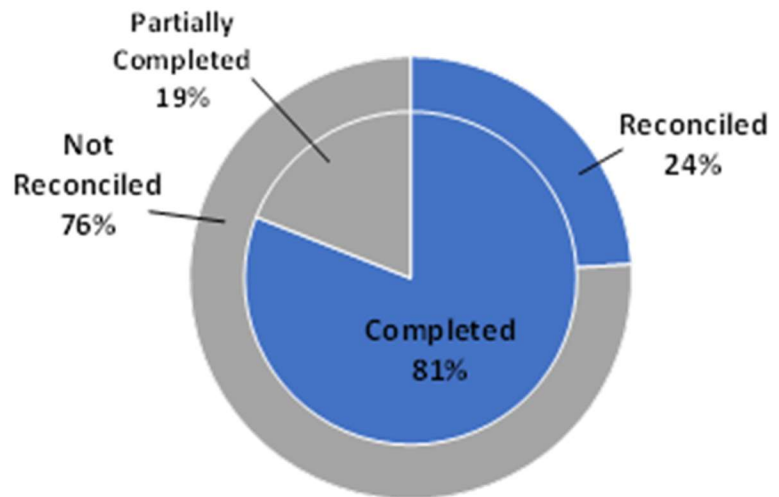
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**every vote matters.
every vote counts.**

Source: S.C. State Election Commission

For York County, ballot reconciliation worksheets for 81% (47/58) of its polling locations were completed, and 24% (14/58) 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 York County's Ballot Reconciliation Worksheets, 2022 General Election

Completion of the Worksheets

For the 19% (11/58) of worksheets considered partially completed, 1 or more rows were left blank on the worksheets. The most common rows left blank were rows C (Additional Ballot Cards) and D (Additional Hand-Marked Paper Ballots). If the user had filled in zeros in all blank rows, then 95% (55/58) of the worksheets would have been completed. For the remaining partially completed worksheets:

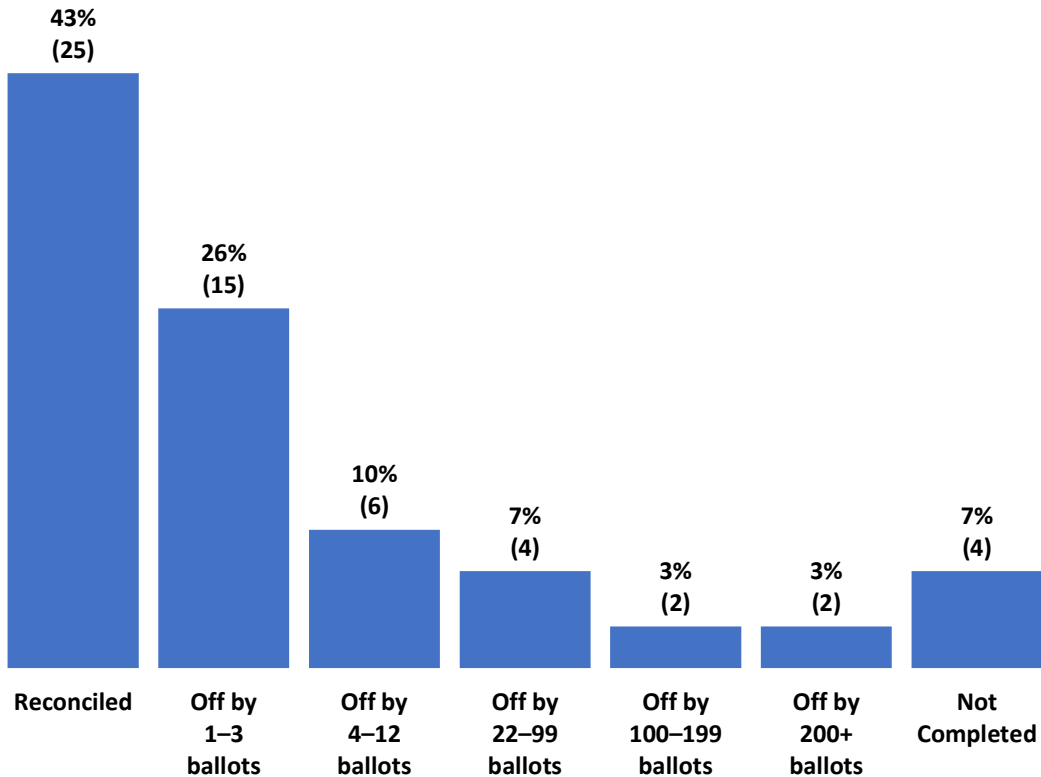
- 2% (1/58) were missing values in rows G and H.
- 2% (1/58) were missing values in row E and rows I-K.
- 2% (1/58) were missing values in rows J and K.

The SEC's 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.

Reconciliation of Line 1

As for reconciliation, 43% (25/58) of the worksheets in our sample were reconciled in Line 1, 50% (29/58) were not, and 7% (4/58) 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 York County's Ballot Reconciliation Worksheets,
2022 General Election

Of the 29 worksheets that did not reconcile in Line 1, 24 received either greater or fewer ballot cards than what was initially stated in row A and row C. This was likely the result of the ballot packaging process, which weighs rather than counts the ballots, and thus 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 rows A and C could be incorrect and, therefore, cause Total 1 (Total Ballots Supplied) to be incorrect. For one of the worksheets affected by this issue, it seems there were also data entry errors in rows A–D that caused Total 1 to be incorrect. Thus, these worksheets most likely had an incorrect Total 1 to start with, which caused Line 1 to not reconcile.

According to a county election official, office staff do not count individual ballot cards prior to an election to ensure the totals listed are accurate. The official also stated that the county should not have to pre-count blank ballot cards according to S.C. Code §7-13-420, which contains the oath to be taken by the vendor contracted for the printing of ballots. The oath states the vendor “will not print or permit to be printed, directly or indirectly, more than the above number” of ballots instructed to be printed. However, this does not apply to the packaged ballot cards as they are not printed ballots but rather blank ballot card stock.

As of 2024, the county has a DS450, which is a high-speed scanner that can count 75 ballots per minute. This scanner can be used to count blank ballot cards to ensure the stated package amount is correct. Poll workers, on the other hand, are trained to count blank ballot cards if time permits it. Having individuals from the county office count ballot cards and then having the poll clerks verify the amount noted by the county office on the worksheet will likely minimize differences between the actual and stated number of ballots supplied.

Another issue that affected seven worksheets, including four which also had an incorrect starting number of ballot cards, was the accounting for hand-marked paper ballots. On all seven worksheets, more hand-marked paper ballots were provided than accounted for. For instance, 1 worksheet noted 100 hand-marked paper ballots were supplied (row B), and 9 of these ballots were used (row F). However, the clerk indicated that 55 remained unused (row I), rather than the 91 that should have been left over. A similar situation occurred on the other worksheets affected by this issue. Thus, if the hand-marked paper ballots had been appropriately accounted for, these worksheets would have reconciled in Line 1.

According to a county election official, the county staff instruct poll workers that the issuance of provisional ballots—a type of hand-marked paper ballot—is a paper-only process separate from the electronic pollbook (EPB). However, the EPB has a process to check-in provisional voters, and this process was outlined in the November 2022 poll manager’s handbook provided by the SEC. Thus, providing poll workers two distinct sets of instructions to check in provisional voters may have caused confusion regarding provisional voters and provisional ballots. Per S.C. Code §7-3-25(A)(3), if there is a difference in policy between the county and the SEC regarding functions to be performed (e.g., checking in provisional voters), the SEC’s policy takes precedence. Thus, training poll workers to check-in provisional voters using the EPB check-in may prevent this issue, since this is the instruction provided by the SEC in the election materials, like the poll manager’s handbook.

For the last three worksheets that did not reconcile in Line 1:

- One worksheet had a simple addition issue. Despite having the correct values transcribed to Line 1 (Total 2 and Total 3), the user did not add them correctly. If the addition had been done properly,

Line 1's total would have been correct, and the line would have reconciled.

- One worksheet had technical issues with the scanner/DS200, as well as an incorrect starting number of ballot cards supplied (row A). According to the explanation provided on the worksheet, the scanner was inoperable for a period of time. Due to this, 27 ballots were not scanned at the polling location and were instead returned to the county office for review. However, even without the technical issues and an incorrect value for row A, this worksheet still would not have reconciled since the poll clerk did not account for the provisional ballots. Note, this technical issue also impacted the reconciliation of Line 2, which is discussed below.
- The last worksheet had legibility issues, as well as multiple addition errors, which made it difficult to discern what was the main cause for the worksheet not reconciling.

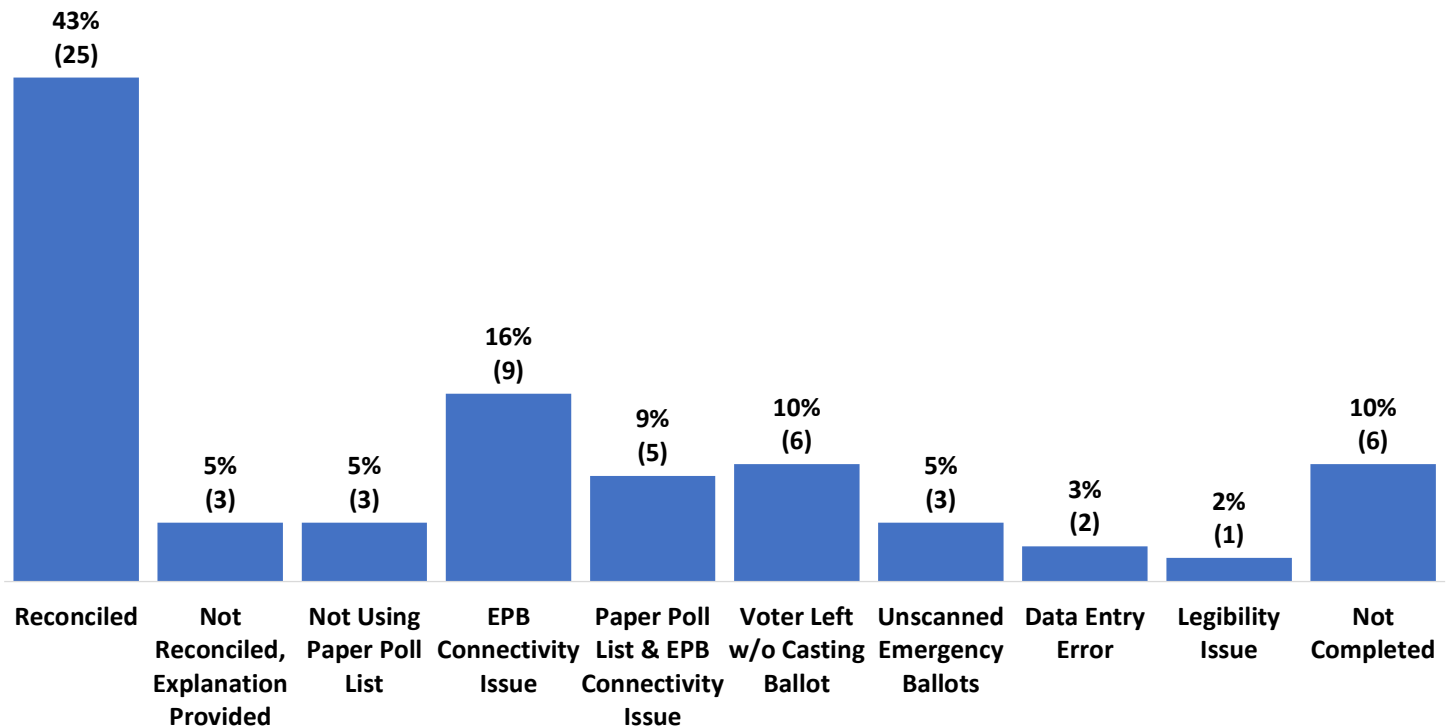
Lastly, four worksheets were considered incomplete in Line 1. For two of the worksheets, some of rows C–K had been completed, but both Line 1 and Line 2 were completely blank. For the other two worksheets, Total 2 and Total 3 had been correctly transcribed to Line 1, but Line 1's total had not been added together. Regardless, based on the numbers available on these worksheets, they would not have reconciled even if they had been completed.

According to a county election official, the ballot reconciliation worksheet review process occurs the day after an election. During this review, office staff check values entered into the worksheet against the election results tabulated from the equipment. It is important to note that the county utilizes a margin of tolerance during its review, so only the worksheets falling outside of the accepted margin are reviewed further. This margin of tolerance allows for worksheets to be off by up to four ballots between the values written on the worksheet and the records they are checked against (e.g. Voters Checked In/Electronic Pollbook). However, since 12% (7/58) of the worksheets in our sample were off by at least 50 ballots in Line 1 and 9% (5/58) were either incomplete or illegible, it seems there may be areas for improvement in the county's worksheet review process. Checking that all worksheets are completed, legible, and reconciled prior to certification may prevent these issues.

Reconciliation of Line 2

As for Line 2, 43% (25/58) of the worksheets were reconciled, 47% (27/58) of the worksheets were not, and 10% (6/58) were not completed. Figure 5 below provides a breakdown of Line 2.

Figure 5: Reconciliation Status of Line 2



Note: Off by 8% due to three worksheets having multiple issues.

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

Of the 27 worksheets that did not reconcile on the line, 3 provided an adequate explanation as to why:

- One worksheet, off by three ballots, explained that three voters who voted by provisional ballots had originally signed the paper poll list (row K) because the poll worker could not find them in the EPB. However, these voters were eventually found in the EPB and checked in. Thus, the issue arose from having three voters counted twice: once in row J (Voters Checked In/Electronic Pollbook) and again in row K (Voters Checked In/ Paper Poll List). This explains the error, and the line otherwise reconciles. Again, training poll workers on how to correctly process provisional voters through the EPB may prevent this error.

- One worksheet, off by one ballot, stated a ballot card, after being processed by the ballot marking device, was not scanned by the scanner/DS200. The poll clerk indicated at the bottom of the worksheet that a ballot would be returned to the county office. If the clerk did in fact return one unscanned ballot, the line would otherwise reconcile. Thus, checking returned election materials, i.e., unscanned ballots, during the worksheet review process may prevent this issue in reconciliation.
- The last worksheet, off by 27 ballots, is the same worksheet discussed earlier in Line 1's analysis. The explanation provided for Line 1 also explains the error in Line 2 (see above).

The remaining 24 worksheets that did not reconcile in Line 2 contained a variety of issues as described below.

# OF WORKSHEETS	MAIN ISSUE	ISSUE DESCRIPTION
3	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. Training poll workers on how and when to appropriately use the paper poll list may prevent this issue.
9	Electronic Pollbook Connectivity Issue	<p>These worksheets were likely off due to technological 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. A similar situation occurred on the other worksheets affected by this issue.</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>

6	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 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. 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.
3	Unscanned Emergency Ballots	<p>These worksheets likely did not reconcile due to unscanned ballots. For example, one of the worksheets had five more voters 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 five unscanned ballots, the worksheet may have reconciled. Again, checking returned election materials like unscanned ballots during the worksheet review process may prevent this issue. One of the other worksheets with this issue also likely had technological issues related to the EPB, which prevented it from reconciling.</p>
5	Paper Poll List & Electronic Pollbook Connectivity Issue	<p>These worksheets likely did not reconcile due to issues related to both the paper poll list and the EPB. As stated previously, reviewing the returned election materials, such as the paper poll list and the host server turnout report, may prevent these types of issues.</p>
2	Data Entry	<p>Two worksheets had data entry errors. One worksheet incorrectly recorded the values in row E (Ballots Scanned) and Total 4 (Total Voters Checked In). This was verified by reviewing the turnout report, scanner/DS200 data, as well as speaking to county staff. Using the corrected data, Line 2 reconciled. Similar data entry errors occurred on the other worksheet affected by this issue. However, after reviewing the turnout report and scanner/DS200 data, it seems this worksheet also was affected by EPB technological issues. Even with the corrected data in the worksheet, Line 2 did not reconcile as there was still one more voter checked in than ballots voted.</p>

1	Illegible	One worksheet had legibility issues, as well as multiple addition errors, which made it difficult to discern what caused the issue.
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Finally, six worksheets were considered incomplete in Line 2. For two of the worksheets, some of rows C–K had been completed, but both Lines 1 and two were completely blank. For another two worksheets, Line 2 was left blank, but other areas of the worksheet had been completed. For the last two worksheets, part of Line 2 had been completed, but the total was not calculated. Regardless, based on the numbers that were available on these incomplete worksheets, they would not have reconciled even if completed. Again, ensuring all worksheets are appropriately completed during the worksheet review process may prevent issues related to incompleteness.

It is important to note that the ballot reconciliation worksheet audit for York County began 24 months ago. Although the audit focuses on materials from the November 2022 General Election, our recommendations remain relevant, as the county has not implemented any significant changes to its processes since that time. 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 York County Voter Registration and Elections Office should count individual ballot cards prior to elections to ensure the correct number of ballots are being supplied.
2. The York County Voter Registration and Elections Office should train poll workers to count individual ballot cards, once a new pack is opened, to ensure the number of ballots listed on the ballot reconciliation worksheet is accurate.
3. The York County Voter Registration and Elections Office should train poll workers to check in provisional voters through the process available on the electronic pollbook in accordance with the procedures in the poll managers handbook.
4. The York County Voter Registration and Elections Office, during poll worker training, should place emphasis on:
 - Accounting for hand-marked paper ballots throughout the worksheet.
 - Proper use of the paper poll list.
5. The York County Voter Registration and Elections Office should implement a worksheet review process that checks and corrects, where necessary and prior to certification, the worksheets:
 - For completion and legibility.
 - Against returned election materials, such as unscanned ballots.
 - Against the host server turnout report for voters checked in.

Appendix A: Objective, Scope, and Methodology

This report provides the results of our compliance audit of the York 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: York County Comments



BOARD OF VOTER REGISTRATION & ELECTIONS OFFICE OF YORK COUNTY

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September 17, 2025

Naomi Washington, Audit Manager
South Carolina State Election Commission
1122 Lady Street
Columbia SC 29201

Dear Ms. Washington,

Thank you for the final draft of the Audit Report for the 2022 General Election conducted in York County, S.C. on Tuesday, Nov. 8, 2022. The findings, recommendations, and summation of our responses are noted. Several summations of our responses to the initial draft have been taken out of context:

SEC Final Draft of the Audit Report: Page 11, First Paragraph –

- To be clear the York County BVRE is not stating that our staff is unwilling to count the ballot cards prior to sending them out to the polling places. We are attempting to focus the solution on the point of failure. The point of failure in this case is the vendor, to whom we are paying to provide a specified quantity of ballot card stock, is using an inaccurate method for determining quantity. They are using weight as opposed to actual counting the quantity of ballot cards requested by the customer. This vendor is certified by the SC State Election Commission to provide election equipment and supplies such as ballot card stock. SC Code of Laws 7-13-420 requires ballot vendors to provide the exact quantities of ballots that are ordered by the Board of Voter Registration and Elections of each county.
- To reiterate our response to Recommendation 1 (below) and to the above referenced section still stands. The current process in York County is to minimize unnecessary handling and damage to the initial ballot card stock by maintaining the integrity of the original vendor packaging until opened by poll managers on election morning. Post-election unused ballot card stock is collected, counted, and repackaged using York County's two DS-450s. Repackaged ballot card stock is wrapped into verified quantities of 250 cards per wrap. Black cellophane wrap is used to reduce light contamination to the card stock. The duty of our office is to maintain the integrity and high quality of the ballot stock as it is expensive, used for every election, and is required for voters to cast ballots.

SEC Final Draft of the Audit Report: Page 11, Fourth Paragraph –

- The process for poll workers to enter provisional ballot voters into the Electronic Pollbooks (EPBs) is incorrect as referenced as far back as the September 2022 SEC Poll Managers Handbook through the current edition. The Electronic Pollbook database and functionality is defined and configured by the SEC for every county for all elections. Counties do not have

the ability to edit this file nor do counties have the ability to activate features that are controlled by the SEC. EPB files are limited to only the registered voters who are eligible to vote in the election being conducted. Poll Managers do not have access or permissions to add voters not found in the EPB list. The VAST majority of provisional ballots are issued to voters whose names DO NOT appear in the EPB election database. The instructions from the Poll Managers Handbook assume the functionality to add ineligible voters is activated, when in actuality the configuration of the SEC EPB database has this feature disabled. Counties cannot use this feature because the SEC has it disabled at the State Level.

- Given that Election Workers cannot process all provisional ballot voter situations in the EPBs, then it is the determination of York County BVRE management that none of the provisional ballot voters will be processed in the EPBs.
- For this reason, front line election workers are trained to redirect these provisional voters to the resolution table and not process them in the EPBs.
- Simply put to avoid confusion and mistakes, all Provisional Ballots cast in York County are processed outside the EPBs and handled by the Precinct Clerk in one inclusive all paper process (signature on paper poll list, hand-marked ballot, and properly completed provisional ballot envelope).
- Following the procedures as defined in all recent versions of the Poll Managers Handbook for provisional balloting, would create multiple unnecessary processes at the check-in positions when one process is sufficient to account for all provisional situations.
- While policies and procedures are wonderful tools to maintain consistency of operations. It is just as important to ensure that policies and procedures are routinely reviewed and revised to ensure accuracy, effectiveness, continuity, and reality.
- In summary, inaccurate and outdated Policy and Procedures referenced in the Poll Managers Handbook and poll managers training for processing provisional ballot voters do not reflect the SEC EPB Configuration files provided to Counties. Thus, county election officials are filling in the gaps where the SEC procedures fail to address.

SC State Election Commission Audit Division, while we appreciate their ability to summarize and attention to detail, we want to make certain that our full response is provided. The Board of Voter Registration and Elections of York County's initial responses to the Audit Division's report are on the following pages.



BOARD OF VOTER REGISTRATION & ELECTIONS

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The Board of Voter Registration and Elections Office of York County provides the following response to the S.C. State Election Commission Audit Division's summation below:

SEC Recommendation 1

The York County Voter Registration and Elections Office should count individual ballot cards prior to elections to ensure the correct number of ballots are being supplied.

Response 1

Election Systems & Software, Inc. (ES&S) is the vendor and manufactures the official ballot cards for the statewide voting system. This office orders ballot cards directly from the vendor in large quantities. The ballot cards are packaged by the vendor into their standard 250 cards per wrap at ten wraps per box for a total of 2,500 ballot cards a box. ES&S is the sole voting system vendor certified by the State Election Commission to operate in the State to provide voting equipment and to serve as the official ballot stock supplier in South Carolina.

The vendor is responsible for the initial quality and quantity for the ballot cards they sell.

Our goal is to limit direct handling of the ballot cards to prevent unintended damage to the ballot card stock. This effort maintains the original vendor ballot card packaging until it is distributed for use at polling locations. Once the original vendor supplied ballot card wrap is broken at the polling location by election workers and returned to the Board of Voter Registration and Elections Office for York County, any unused/blank ballots cards are collected, counted, and repackaged by this office into verified quantities of 250 ballot cards per wrap.

If the State Election Commission is not satisfied with the quality and method used by ES&S for determining quantities of an initial supply of ballots cards, it is our recommendation that the State Election Commission should address this issue directly with Election Systems & Software, Inc. as part of continual vendor and ballot printer certification processes. South Carolina Code of Laws 7-13-420 requires, in summary, ballot printing vendors must provide the exact number of ballots ordered and requires such vendors to destroy any excess before distribution to the customer.

SEC Recommendation 2

The York County Voter Registration and Elections Office should train poll workers to count individual ballot cards, once a new pack is opened, to ensure the number of ballots listed on the ballot reconciliation worksheet is accurate.

Response 2

Election Systems & Software, Inc. is responsible for the initial quality and quantity for the ballots card they sell. Election workers are trained and are required to complete and conduct many essential tasks throughout early voting and election day. In an instance where the voting operation workload and timing permits, election workers may count ballot cards, and are trained to do so.

SEC Recommendation 3

The York County Voter Registration and Elections office should train poll workers to check in provisional voters through the process available on the electronic pollbook in accordance with the procedures in the poll managers handbook.

Response 3

County Boards of Voter Registration and Elections are required by Federal and State Law to conduct elections, based on our professional judgment and experience, it is best practice to completely remove the issuance of provisional ballots from the electronic pollbooks. The current electronic pollbook is not setup to log every situation in which a provisional ballot may be issued. Furthermore, handling provisional ballot workflows at the electronic pollbook contributes to a longer wait time for voters in line.

The practice in York County keeps the front-line election workers focused on confirming eligible voter qualifications (Photo IDs, Addresses, DOB, etc.) via the electronic pollbooks and redirecting exceptions, as necessary, including provisional balloting, to the resolution table for proper workflow and documentation. In addition, redirecting voter qualifications issues away from the check-in process to the resolution table aids in preventing long wait times for ballot access for most voters.

SEC Recommendation 4

The York County Voter Registration and Elections office, during poll worker training, should place emphasis on:

- *Accounting for hand-marked paper ballots throughout the worksheet.*
- *Proper use of the paper poll list.*

Response 4

Given that the materials audited are from an election conducted 2 years, 9 months, 2 weeks, and 4 days ago, improvements in training election workers on the proper completion of the Ballot Reconciliation Worksheet are in place. These improvements mostly centered around a redesign of the SCSEC's Ballot Reconciliation Worksheet for better color coding, clarity of process, and to simplify verbiage used within the document. This redesign has been successfully integrated into the election worker training and operational process at the polls. The recommendation to instruct election workers to complete any empty or blank worksheet fields with a Zero is new guidance. This office acknowledges the updated guidance and will implement on future worker instruction and worksheets.

SEC Recommendation 5

The York County Voter Registration and Elections Office should implement a worksheet review process that checks and corrects, where necessary and prior to certification, the worksheets:

- *For completion and legibility.*
- *Against returned election materials, such as unscanned ballots.*
- *Against the host server turnout report data for voters checked in.*

Response 5

The Board of Voter Registration and Elections Office for York County will take these recommendations



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under advisement and will apply to our election worker training program and election night recovery operations. Conducting elections requires constant feedback to make quality process improvements.

Thank you for the opportunity to review the draft report and working with the Board of Voter Registration and Elections Office for York County on establishing constructive and meaningful improvements to election administration in South Carolina.

Respectfully,

Anthony 'Alan' Helms, Jr.
Executive Director