



STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

June 2, 2022

Richard Lowe, Director
Office of Internal Audit Services
George W. Romney Building
111 South Capitol Avenue, 8th Floor
Lansing, MI 48933

Dear Mr. Lowe:

In accordance with the State of Michigan Financial Management Guide, Part VII, and Article V, Part 2, Section 229 of P.A. 87 of 2021, attached is a summary table identifying our responses and corrective action plans to address recommendations contained within the Office of the Auditor General's audit report of the Michigan Department of State, Bureau of Elections, covering the period May 1, 2019 through May 31, 2021.

Questions regarding the summary table or corrective action plans should be directed to me at (517) 230-5414.

Sincerely,

Andrea McGhee

Andrea McGhee, Audit Liaison
Information Security and Control Division
Michigan Department of State

Enclosures

c: Honorable Gretchen Whitmer, Executive Office
Honorable Jocelyn Benson, Secretary of State
Doug Ringler, CPA, CIA, Auditor General
Christopher Harkins, State Budget Director
Melissa Smiley, MDOS, Chief of Staff
Mike Brady, MDOS, Chief Legal Director
Jonathan Brater, MDOS, Bureau of Elections Director
Erin Schor, MDOS, Legislative Policy Director
Jake Rollow, MDOS, Chief External Affairs Officer
Senator Jim Stamas, Chair, Senate Appropriations
Representative Thomas Albert, Chair, House Appropriations
Kathryn Summers, Director, Senate Fiscal Agency
Mary Ann Cleary, Director, House Fiscal Agency

Michigan Department of State
Performance Audit of the Bureau of Elections
Summary of Agency Responses to Recommendations
May 1, 2019 through May 31, 2021

The Auditor had four recommendations for the Bureau of Elections:

1. Audit Recommendations the agency complied with:
Recommendation Number 1 and 2
2. Audit Recommendations the agency agrees with and will comply:
 - a. Will comply:
Recommendation Number 3 and 4
 - b. Will partially comply:
N/A
3. Audit Recommendation the agency disagrees with:
None

**Michigan Department of State
Performance Audit of the Bureau of Elections
Agency Preliminary Responses
May 1, 2019 through May 31, 2021**

RECOMMENDATION #1

FINDING TITLE: Full reconciliation between DLF and QVF needed.

RECOMMENDATION: It is recommended that BOE improve its process for reconciling data between the DLF and QVF to help decrease the risk of ineligible electors voting in Michigan or eligible electors not receiving the correct ballot for their jurisdiction.

ANTICIPATED ACTION: Complied

DESCRIPTION OF ANTICIPATED ACTION:

The Bureau of Elections implemented the following controls to comply with the audit recommendation:

- *A. Completed:* BOE researched and resolved or forwarded for investigation address discrepancies found by auditors. BOE implemented a process in March 2022 to establish an ongoing quarterly reconciliation between the DLF system and QVF to assist with decreasing the number of address mismatches between the systems.
- *B. Completed:* In October 2021, BOE performed a reconciliation that identified all deceased individuals in the current DLF and updated QVF accordingly. BOE implemented a process in March 2022 to establish an ongoing quarterly reconciliation between the DLF system and QVF to assist with updating deceased records.

Compliance Date: April 6, 2022

RECOMMENDATION #2

FINDING TITLE: Security configuration controls over EPB should be improved

RECOMMENDATION: It is recommended that BOE improve its security configuration controls over EPB to help prevent and detect inappropriate access and protect elector information from unauthorized use, disclosure, modification, or destruction.

ANTICIPATED ACTION: Complied

DESCRIPTION OF COMPLETED ACTION:

The Bureau of Elections implemented the following controls to comply with the audit recommendation:

- *Completed:* BOE implemented changes to the security configurations to address the issues identified by OAG.
- *Completed:* BOE updated the method for accessing EPB, and previous information is no longer applicable.

Compliance Date: September 1, 2021

RECOMMENDATION #3

FINDING TITLE: Improved controls needed to ensure proper oversight and reporting of post-election audits

RECOMMENDATION: It is recommended that BOE improve its oversight and reporting of the post-election audits assigned to county clerks.

ANTICIPATED ACTION: Will comply

DESCRIPTION OF ANTICIPATED ACTION:

The Bureau of Elections began implementing the following controls to comply with the audit recommendation:

- A. B. (1) *Completed:* BOE instituted capability to send confirmation of audit submission to both county and local clerks upon completion.
- A. B. (2) *Planned:* BOE will establish written protocols to ensure that BOE staff regularly review all audit results submitted to the module, including review of hand counts, and notify management of concerns. Target date: September 2022
- A. (3) *Planned:* Improve online module to make it easier for county clerks to submit their audit results and to facilitate BOE staff review of results using the module. Target date: September 2022
- B. (3) *Completed:* BOE implemented a process of online reporting of audit completion and will utilize the improved process to ensure that all completed worksheets include a specific field in which the clerk must indicate that the hand count of the race specified by BOE was completed.

Anticipated Compliance Date: September 30, 2022

RECOMMENDATION #4

FINDING TITLE: Post-election audit training and certification programs need improvement.

RECOMMENDATION: It is recommended that BOE ensure county clerks and their staff receive post-election audit training and are appropriately certified to conduct post-election audits.

It is also recommended that BOE ensure city and township clerks receive relevant training based on post-election audit deficiencies identified by county clerks.

ANTICIPATED ACTION: Will Comply

DESCRIPTION OF ANTICIPATED ACTION:

The Bureau of Elections began implementing the following controls to comply with the audit recommendation:

- *A. B. C. Completed:* BOE established and implemented a formal certification training class that county clerks and other county officials who conduct post-election audits are required to complete. This class allows county clerks and other county officials to meet the certification requirements for conducting post-election audits. BOE verified that each county clerk and other county officials who conduct post-election audits have completed the certification program. BOE updated the eLearning system to only include the names of certified election officials for selection when submitting the post-election audit form.
- *D. Planned:* BOE will implement a process in eLearning to assign training materials to city and township clerks based on opportunities for improvement identified in BOE or county conducted post-election audits. Target date: September 2022.

Anticipated Compliance Date: September 30, 2022