

Audit Report

State Board of Elections

December 2019



OFFICE OF LEGISLATIVE AUDITS
DEPARTMENT OF LEGISLATIVE SERVICES
MARYLAND GENERAL ASSEMBLY

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DEPARTMENT OF LEGISLATIVE SERVICES
OFFICE OF LEGISLATIVE AUDITS
MARYLAND GENERAL ASSEMBLY

Victoria L. Gruber
Executive Director

Gregory A. Hook, CPA
Legislative Auditor

December 12, 2019

Senator Craig J. Zucker, Senate Chair, Joint Audit and Evaluation Committee
Delegate Shelly L. Hettleman, House Chair, Joint Audit and Evaluation Committee
Members of Joint Audit and Evaluation Committee
Annapolis, Maryland

Ladies and Gentlemen:

We have conducted a fiscal compliance audit of the State Board of Elections (SBE) for the period beginning October 23, 2015 and ending December 2, 2018. SBE is responsible for managing and supervising elections and voter registrations in the State. SBE directs, supports, monitors, and evaluates the activities of each of the 24 local boards of election.

Our audit disclosed that improvements were needed to SBE's existing processes and controls to ensure the integrity of the Statewide voter registration records. Specifically, SBE did not perform periodic documented reviews of the voter registration system to ensure that access capabilities were properly restricted. Furthermore, SBE's oversight processes were not adequate to ensure that local boards of election appropriately corrected voter registration data based on the results of internal reviews of voter registration activity and the reports of possible ineligible voters that it received from external sources.

In addition, SBE systems, including the online voter registration website and the electronic pollbook system used for voter check-in, were at risk since controls were inadequate to ensure that only properly authorized program changes were placed into production for these systems.

Finally, our audit included a review to determine the status of the eight findings contained in our preceding audit report. We determined that SBE satisfactorily addressed seven of these findings, with the remaining finding repeated in this report as two findings.

SBE's response to this audit is included as an appendix to this report. We reviewed the response and noted general agreement to our findings and related recommendations, and we will advise the Joint Audit and Evaluation Committee of any outstanding issues that we cannot resolve with SBE.

We wish to acknowledge the cooperation extended to us during the audit by SBE and its willingness to address the audit issues and implement appropriate corrective actions.

Respectfully submitted,

A handwritten signature in black ink that reads "Gregory A. Hook". The signature is written in a cursive style with a large, stylized initial 'G'.

Gregory A. Hook, CPA
Legislative Auditor

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* Denotes item repeated in full or part from preceding audit report

Background Information

Agency Responsibilities

The Election Law Article, Section 2-101 of the Annotated Code of Maryland, established the State Board of Elections (SBE) under the direction of a five-member Board appointed by the Governor, with the advice and consent of the Senate. In addition, in accordance with Section 2-201 of the aforementioned Article, the Governor has appointed local boards of election within each of the State's 24 subdivisions. Each local board is charged with overseeing the conduct of all elections within its respective jurisdiction.

SBE is responsible for managing and supervising elections and voter registrations in the State. SBE directs, supports, monitors, and evaluates the activities of each local board. In addition, SBE administers sections of the Election Law Article that govern the receipt and expenditure of funds for election campaigns and administers the Public Financing Act, which provides for public financing of the campaigns of eligible gubernatorial candidates who elect to use such funds. SBE also serves as a depository for election and registration records, campaign financial reports, and other election information. According to the State's records, during fiscal year 2018, SBE had 41.8 authorized positions and expenditures totaled approximately \$22.9 million. SBE also processes the payroll for the local boards of election in 20 of the 24 local subdivisions, which during fiscal year 2018 totaled an additional \$13.0 million, and is subsequently reimbursed for these costs by the respective local boards of election.

U.S. Election Assistance Commission Audit

A federal audit of Help America Vote Act (HAVA) funds found that \$14.4 million received by SBE was not adequately supported and should be returned. The U.S. Election Assistance Commission Office of the Inspector General (EAC) contracted with an independent certified public accounting firm to audit SBE's administration of funds received under HAVA. The audit covered authorized HAVA grant funds, according to federal financial reports, totaling approximately \$54.9 million during the period from January 1, 2006 through September 30, 2015.

SBE was notified by EAC in September 2017 that the audit found SBE had generally accounted for and expended HAVA funds in accordance with applicable requirements. However, the audit determined that SBE did not provide adequate documentation to support the authorization of certain expenditures totaling approximately \$14.4 million, and EAC recommended the funds be returned.

SBE stated in its response to the audit report that the State's financial management system maintains detailed information for 5 years, but, since the information requested during this audit ranged from 6 to 11 years ago, certain information was difficult to obtain. Furthermore, although the majority of the purchases in question were from 2006 to 2008, SBE had located additional documentation for \$13.7 million of the disallowed expenditures that it stated would be provided to EAC. SBE maintains that all the expenditures in question were allowable. As of May 1, 2019, EAC had yet to make a final determination regarding the status of these funds.

Status of Findings From Preceding Audit Report

Our audit included a review to determine the status of the eight findings contained in our preceding audit report dated April 24, 2017. We determined that SBE satisfactorily addressed seven of these findings. The remaining finding is repeated in this report, which appears as two findings as noted in the following table.

Table 1
Status of Preceding Findings

Preceding Finding	Finding Description	Implementation Status
Finding 1	SBE did not ensure the accuracy of the data recorded in MDVOTERS or whether related user access to the system was appropriate.	Repeated (Current Findings 1 and 2)
Finding 2	SBE did not ensure that personally identifiable information from the MDVOTERS database provided to an external third party was properly safeguarded.	Not repeated
Finding 3	SBE unnecessarily retained personally identifiable information within the MDVOTERS database.	Not repeated
Finding 4	SBE did not adequately authenticate certain voters who requested absentee ballots.	Not repeated
Finding 5	A critical voting system was not backed up offsite and was not properly addressed in the SBE Disaster Recovery Plan.	Not repeated
Finding 6	Controls were not in place over the receipt and opening of certain bids, and SBE could not support that two single source contract awards were in the State's best interest. Additionally, SBE did not publish certain contract awards in <i>eMaryland Marketplace</i> .	Not repeated
Finding 7	SBE did not have a comprehensive process in place to ensure that certain billed work was in accordance with approved contract terms or was adequately documented.	Not repeated
Finding 8	At the 2015 fiscal year-end, SBE had an unexplained deficit fund balance and had recorded certain unsupported revenues to eliminate deficits.	Not repeated

Findings and Recommendations

Statewide Voter Registration

Background

State and federal law require the State Board of Elections (SBE) to establish, maintain, and administer a Statewide voter registration database. The Statewide voter registration system (MDVOTERS) contains the State's official voter registration database and is separate from the Statewide electronic voting system. Employees from each of the State's 24 local boards of election (LBE) are primarily responsible for processing (adding, deleting, changing) voter registration data on MDVOTERS. SBE is responsible for maintaining MDVOTERS and assumes a monitoring responsibility for ensuring that the LBEs are properly processing voter data.

In addition, SBE, in concert with 28 other states and the District of Columbia, takes part in an initiative to help ensure the accuracy of voter registration data. Under a multi-state compact, SBE provides certain information on MDVOTERS to the nonprofit Electronic Registration Information Center (ERIC), which includes the name, date of birth, driver's license number, and last four digits of the social security number of each registered voter in Maryland. ERIC compares voter data from various sources and provides the states' election officials with reports of potential ineligible voters, such as voters registered in multiple states. ERIC makes use of a third-party vendor to store and process the collected voter data.

According to SBE records, there were 4,028,106 active registered voters in MDVOTERS as of December 2018 and, during calendar year 2018, there were 297,292 new voters added to the database and 208,475 voters removed.

Finding 1

SBE did not perform periodic documented reviews of access to MDVOTERS to ensure access capabilities were appropriately restricted.

Analysis

SBE did not perform periodic documented reviews of access to MDVOTERS to ensure access capabilities were properly restricted. According to system-generated user access reports, as of February 2019, there were 257 user accounts with active network access. For a user to access MDVOTERS, the user requires access to both MDVOTERS and to the network on which the system is hosted.

Although SBE advised us that periodic reviews of network-level access were performed for SBE employees, there was no documentation that any such reviews had been performed during the audit period. In addition, SBE advised us that user access for LBE employees was to be reviewed by each LBE monthly for appropriateness based on SBE-supplied access information; however, there was no documentation of such reviews by any LBE since February 2018. Finally, SBE's processes for these periodic system access reviews for SBE and LBE employees were inadequate since the reviews used a manually prepared spreadsheet of SBE-approved user network access forms rather than system-generated access reports from MDVOTERS. By not using a system-generated access report from MDVOTERS, the process was subject to an increased risk of inaccuracies, because the spreadsheet may not be a reliable source due to manual errors and omissions.

Our concern over inaccuracies was confirmed by our testing. Specifically, we obtained a system-generated report of all users who had network access, as of February 2019, and performed a comparison of the access report with the corresponding SBE-maintained spreadsheet of approved user access forms. Our comparison documented the unreliability of the spreadsheets that were used for evaluating user access, as it disclosed the following errors and omissions.

- We identified 39 user accounts on the SBE spreadsheet of approved access forms that were still listed as active, but that no longer had network access according to the system-generated access report.
- We identified eight active user accounts according to the system-generated access report that were not included on SBE's spreadsheet of approved access forms. SBE confirmed that seven of the eight users required such access to perform their job duties, and access for the eighth user, who had never logged on the network, was subsequently removed after we brought the matter to SBE's attention. Additionally, for five of the seven users who required network access, there were no approved access forms on file at the time of our review. Although these five users had access to the network, they did not have access to MDVOTERS.

In addition, we obtained a different system-generated report of all users who had access to MDVOTERS as of February 2019, and identified 46 active user accounts that had critical access capabilities and could modify voter registration information. Our review of these users disclosed that 42 needed the access assigned to perform their job duties. However, we identified 4 generic user accounts with the capability to modify voter registration information that were not assigned to an individual user. This practice results in a lack of accountability

over related transactions processed. Our review of system activity reports for calendar years 2015 to 2018 disclosed no registration changes had been made using these four accounts.

The State of Maryland *Information Technology Security Manual* requires agencies to monitor the security controls over their information systems, including periodic reviews of access for propriety. A similar condition regarding the failure of SBE to perform periodic reviews of the propriety of user access granted to the network and MDVOTERS was commented upon in our preceding audit report.

Recommendation 1

We recommend that SBE

- a. perform documented periodic reviews for propriety of all user access to the network and MDVOTERS as required by the *Information Technology Security Manual* (repeat);**
- b. use system-generated reports of user access when performing these reviews to ensure that the information being reviewed is current, reliable, and complete; and**
- c. take the necessary corrective action as a result of these reviews, including removing access from all individuals who do not require such access to perform their normal job duties (repeat) and eliminating the use of generic user accounts.**

Finding 2

SBE's oversight processes were not sufficient to ensure the accuracy of voter registration data recorded in MDVOTERS.

Analysis

SBE's oversight processes for ensuring the accuracy of voter registration data recorded in MDVOTERS were not sufficient. SBE had established processes to identify incorrect information in MDVOTERS, including using data received from ERIC and other sources. However, SBE did not ensure that MDVOTERS data were appropriately corrected by the LBEs for errors identified from these processes, and our review noted instances where corrective action was not taken.

- SBE did not adequately ensure LBEs took appropriate corrective action based on the results of monthly reviews of MDVOTERS voter registration activity. On a monthly basis, SBE directed each LBE to conduct a peer review of voter registration record activity, such as additions or removals, of another designated LBE for accuracy and support in accordance with established

guidelines. SBE reviewed the related peer review schedules and logged the results on a spreadsheet to monitor the LBEs, which were instructed to take the corrective action for errors or omissions noted. SBE supplemented the peer reviews by conducting its own similar reviews of voter registration activity for 4 LBEs each month on a rotating basis. However, our testing of 20 LBE and SBE reviews performed during the period from March 2017 through October 2018 found that, as of March 2019, action had not been taken for 9 of the 38 identified errors or omissions that required correction.

- SBE did not sufficiently ensure LBEs took appropriate corrective action based on reports of possible ineligible voters received every other month from ERIC. These reports typically included voters registered in other states or recorded as deceased on the federal Death Master File, which is a central record compiled by the federal Social Security Administration. For example, a February 2018 ERIC report included 416 voters registered in Maryland who may be deceased. In accordance with established procedures, SBE distributed the ERIC reports to the LBEs to investigate, and the LBEs routinely reported the results of their investigations to SBE. However, SBE did not have a process to verify that the LBEs made appropriate changes to MDVOTERS based on the results of their investigations until October 2018, and this process had not been fully implemented as of February 2019.

Our limited test of 10 possible ineligible voters included on ERIC reports from December 2017 and February 2018 confirmed the LBEs took appropriate corrective action regarding these voters. A similar condition regarding the failure of SBE to ensure LBEs followed up on reports of possible ineligible voters received from ERIC was commented upon in our preceding audit report.

The lack of an adequate review of voter registration data could result in voter registration records containing inaccurate information. For example, SBE receives information about possibly deceased voters periodically from both the Maryland Department of Health (MDH) and from ERIC. We performed an independent comparison of MDH State of Maryland death record information (as of April 27, 2018) to voter registration data on MDVOTERS (as of February 27, 2019) and identified approximately 1,000 individuals who appeared to be deceased and registered as voters in Maryland. We provided the results of the match to SBE in March 2019 for its investigation; however, SBE could not immediately advise whether any of these individuals had been previously identified during its periodic reviews of MDH-provided death information.

Recommendation 2

We recommend that SBE establish oversight processes to ensure that LBEs have taken the appropriate corrective actions to update voter registration records in MDVOTERS for both

- a. the results of various reviews performed by the LBEs and SBE, and**
- b. information obtained from outside entities such as ERIC (repeat).**

Information Systems Security and Control

To support State of Maryland voter registration and elections activities (including online voter registration and early voting), SBE maintains a local area network for its headquarters operation, which includes servers that support election management, campaign finance reporting, and email communications. The SBE headquarters network is connected to the Internet, and SBE uses networkMaryland for its wide area network connections to the 24 local boards of election, 4 warehouses, and 2 offsite data centers where the centralized voter registration application resides.

The voter registration and elections activities are supported by multiple application systems, with SBE personnel maintaining the underlying application program code for certain of these application systems involving the online voter registration website, the back-end pollbook system, used for the voter check-in process, and the election management system.

Finding 3

SBE had not established adequate application maintenance controls for developing, reviewing, approving, documenting, and placing program changes into production related to two SBE-maintained application systems.

Analysis

SBE had not established adequate application maintenance controls for developing, reviewing, approving, documenting, and moving program changes into production related to two SBE-maintained application systems. Specifically, SBE personnel maintained the application program code for the Online Voter Registration website and the Electronic Pollbook Interchange and Conversion system, which are important for elections operations.

Our review determined that multiple application programming change controls for supporting the processing of production programs and data files related to these applications either did not exist or were incomplete. For example, changes were made directly to one application's production program code (versus making

changes in a separate controlled test environment) and comparisons were not made to identify all differences between existing and modified program code as a means to detect unexpected programming errors. Additionally, management approvals did not exist for completed program change requests, and responsible IT personnel who made changes placed the modified computer programs into production (rather than having independent personnel perform these updates).

Accordingly, for these two applications, there was a lack of assurance that production data and programs were processed in a manner approved by SBE management. The State of Maryland *Information Technology Security Manual* requires that agencies implement an appropriate change management process to ensure changes to systems are controlled, such as the provision of a controlled environment in which changes to software and hardware are properly authorized, tested, and approved before implementation.

Recommendation 3

We recommend that SBE

- a. prepare modified program code within a separate controlled test environment and generate reports of modified program code differences, which are independently reviewed to confirm change accuracy prior to updating production programs;**
- b. record documented management approvals for modified programs; and**
- c. ensure updated programs are placed into production by personnel other than the individuals who processed the program changes.**

Audit Scope, Objectives, and Methodology

We have conducted a fiscal compliance audit of the State Board of Elections (SBE) for the period beginning October 23, 2015 and ending December 2, 2018. The audit was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

As prescribed by the State Government Article, Section 2-1221 of the Annotated Code of Maryland, the objectives of this audit were to examine SBE's financial transactions, records, and internal control, and to evaluate its compliance with applicable State laws, rules, and regulations.

In planning and conducting our audit, we focused on the major financial-related areas of operations based on assessments of significance and risk. The areas addressed by the audit included purchases and disbursements, voter registration, election oversight, accounts receivable, cash receipts, budgetary closeout, and payroll. We also determined the status of the findings contained in our preceding audit report.

Our audit did not include an evaluation of internal controls over compliance with federal laws and regulations for federal financial assistance programs and an assessment of SBE's compliance with those laws and regulations because the State of Maryland engages an independent accounting firm to annually audit such programs administered by State agencies, including SBE.

To accomplish our audit objectives, our audit procedures included inquiries of appropriate personnel, inspections of documents and records, observations of SBE's operations, and tests of transactions. Generally, transactions were selected for testing based on auditor judgment, which primarily considers risk. Unless otherwise specifically indicated, neither statistical nor non-statistical audit sampling was used to select the transactions tested. Therefore, the results of the tests cannot be used to project those results to the entire population from which the test items were selected.

We also performed various data extracts of pertinent information from the State's Financial Management Information System (such as revenue and expenditure data) and the State's Central Payroll Bureau (payroll data). The extracts are performed as part of ongoing internal processes established by the Office of

Legislative Audits and were subject to various tests to determine data reliability. We determined that the data extracted from these sources were sufficiently reliable for the purposes the data were used during this audit.

In addition, we extracted data from the MDVOTERS voter registration database and the Maryland Department of Health's Vital Records database for the purpose of performing certain tests and to compare these data sets for testing purposes. We performed various tests of the relevant data and determined that the data were sufficiently reliable for the purposes the data were used during the audit. Finally, we performed other auditing procedures that we considered necessary to achieve our objectives. The reliability of data used in this report for background or informational purposes was not assessed.

SBE's management is responsible for establishing and maintaining effective internal control. Internal control is a process designed to provide reasonable assurance that objectives pertaining to the reliability of financial records; effectiveness and efficiency of operations, including safeguarding of assets; and compliance with applicable laws, rules, and regulations are achieved.

Because of inherent limitations in internal control, errors or fraud may nevertheless occur and not be detected. Also, projections of any evaluation of internal control to future periods are subject to the risk that conditions may change or compliance with policies and procedures may deteriorate.

Our reports are designed to assist the Maryland General Assembly in exercising its legislative oversight function and to provide constructive recommendations for improving State operations. As a result, our reports generally do not address activities we reviewed that are functioning properly.

This report includes findings relating to conditions that we consider to be significant deficiencies in the design or operation of internal control that could adversely affect SBE's ability to maintain reliable records, operate effectively and efficiently, and/or comply with applicable laws, rules, and regulations. Our audit also disclosed significant instances of noncompliance with applicable laws, rules, or regulations. Other less significant findings were communicated to SBE that did not warrant inclusion in this report.

SBE's response to our findings and recommendations is included as an appendix to this report. As prescribed in the State Government Article, Section 2-1224 of the Annotated Code of Maryland, we will advise SBE regarding the results of our review of its response.

STATE BOARD OF ELECTIONS**P.O. BOX 6486, ANNAPOLIS, MD 21401-0486 PHONE (410) 269-2840**

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Linda H. Lamone
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Nikki Charlson
Deputy Administrator

December 10, 2019

Via Electronic Mail and DGS Courier

Gregory A. Hook, CPA
Legislative Auditor
Department of Legislative Services
301 West Preston Street, Room 1202
Baltimore MD 21201

Dear Mr. Hook:

Thank you for the opportunity to respond to the Legislative Auditor's audit report for the period from October 23, 2015, through December 2, 2018.

The audit has been very informative, and we are pleased to report that we have either addressed or have a plan to address each of the audit's recommendations. Enclosed is the response to the audit report in the requested format.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Linda H. Lamone".

Linda H. Lamone
State Administrator

Enclosure

State Board of Elections

Agency Response Form

Statewide Voter Registration

Finding 1
SBE did not perform periodic documented reviews of access to MDVOTERS to ensure access capabilities were appropriately restricted.

We recommend that SBE

- a. perform documented periodic reviews for propriety of all user access to the network and MDVOTERS as required by the *Information Technology Security Manual* (repeat);
- b. use system-generated reports of user access when performing these reviews to ensure that the information being reviewed is current, reliable, and complete; and
- c. take the necessary corrective action as a result of these reviews, including removing access from all individuals who do not require such access to perform their normal job duties (repeat) and eliminating the use of generic user accounts.

Agency Response			
Analysis			
Please provide additional comments as deemed necessary.	<p>As described in the audit report, access to MDVOTERS requires access to both the network on which it is hosted – which uses enhanced authentication measures – and the database itself. Access is also limited by the location of the individual trying to access the network and database. An individual can only access the system if the individual is accessing the system from an authorized location.</p> <p>While the audit identified ways to improve administratively the user access review process, the system and the network on which it is hosted is secure and continuously monitored for suspicious activity and transactions. SBE has already implemented the administrative recommendations and will periodically monitor the user access review process to ensure on-going compliance.</p>		
Recommendation 1a	Agree	Estimated Completion Date:	July 2019 - present
Please provide details of corrective action or explain disagreement.	Starting in July 2019, SBE reinstated the process to review periodically the propriety of SBE and local board of elections’ employee access to MDVOTERS.		
Recommendation 1b	Agree	Estimated Completion Date:	July 2019 - present

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Please provide details of corrective action or explain disagreement.	Starting in July 2019, SBE uses system-generated reports of user access when performing reviews of user access and verifies that each individual with access to MDVOTERS has approved access forms on file.		
Recommendation 1c	Agree	Estimated Completion Date:	July 2019 - present
Please provide details of corrective action or explain disagreement.	Starting in July 2019, SBE takes and documents the necessary corrective action identified by the review of user access. This includes removing access for SBE and local board of elections' employees who do not require access to perform their normal job duties.		

Finding 2
SBE's oversight processes were not sufficient to ensure the accuracy of voter registration data recorded in MDVOTERS.

We recommend that SBE establish oversight processes to ensure that LBEs have taken the appropriate corrective actions to update voter registration records in MDVOTERS for both

- a. the results of various reviews performed by the LBEs and SBE, and**
- b. information obtained from outside entities such as ERIC (repeat).**

Agency Response	
Analysis	
Please provide additional comments as deemed necessary.	<p>SBE and the local boards of elections continuously audit voter registration records in MDVOTERS. These audit efforts include the local boards' review of another local boards' voter registration transactions and SBE's on-going audit of similar transactions. These audits ensure that there is a source document for each voter registration change and the document was correctly processed.</p> <p>During an 18-month period, SBE audited almost 5,000 transactions and the local boards audited over 30,000 transactions. The vast majority of these transactions were properly processed, and the most of the identified findings had been corrected.</p> <p>SBE continues to review the 1,000 individuals who are reported as being deceased in the Maryland Department of Health's (MDH) records and canceling voter registration records if SBE can confirm that the individual listed on the MDH's records is the same individual who is registered to vote. This is a time-consuming process and is made more</p>

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	complicated by the fact that the majority of the records pre-date the current database or the current verification and audit process.		
Recommendation 2a	Agree	Estimated Completion Date:	August 2019 - present
Please provide details of corrective action or explain disagreement.	Starting in August 2019, SBE reviews open audit findings. If a local board of elections with an open finding does not timely correct the record, SBE's Voter Registration Division will: (1) make the correction, (2) create new audit finding (failure to correct a previous finding), (3) notify the appropriate Election Director and members of the local board of elections of the new finding, and (4) notify the State Administrator and Director of the Voter Registration Division.		
Recommendation 2b	Agree	Estimated Completion Date:	October 2018 - present
Please provide details of corrective action or explain disagreement.	Although ERIC-generated transactions are included in the audits performed by SBE and the local boards of elections, SBE developed an ERIC-specific audit. Starting with the ERIC reports SBE received on July 18, 2018, SBE reviews the local boards' processing of ERIC reports.		

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Information Systems Security and Control

Finding 3
SBE had not established adequate application maintenance controls for developing, reviewing, approving, documenting, and placing program changes into production related to two SBE-maintained application systems.

We recommend that SBE

- a. prepare modified program code within a separate controlled test environment and generate reports of modified program code differences, which are independently reviewed to confirm change accuracy prior to updating production programs;
- b. record documented management approvals for modified programs; and
- c. ensure updated programs are placed into production by personnel other than the individuals who processed the program changes.

Agency Response			
Analysis			
Please provide additional comments as deemed necessary.	The two-SBE maintained application systems referenced in this finding are being prepared for the upcoming special primary election for the 7 th Congressional District and the combined presidential primary election and special general election. Implementing changes to these systems and processes supporting these changes will be weighed against the election preparation activities that must be performed to conduct the upcoming elections.		
Recommendation 3a	Agree	Estimated Completion Date:	Summer 2020
Please provide details of corrective action or explain disagreement.	SBE has defined for the two SBE-maintained application systems a process for reviewing changes and documenting management approval and uses a software tool to manage and track code changes prior to the changes being moved to production. This tool includes the ability to manage and capture snap shots for code changes and use to reports to identify code changes. One of the identified systems has a test environment, and SBE is developing for the other identified system a plan to transition the current environment into an environment with a separate and controlled test environment. The process for reviewing changes includes an independent and documented review to confirm the accuracy of changes.		
Recommendation 3b	Agree	Estimated Completion Date:	September 2019

State Board of Elections

Agency Response Form

Please provide details of corrective action or explain disagreement.	SBE has defined for two SBE-maintained application systems a process for requesting software changes and documenting management approvals.		
Recommendation 3c	Agree	Estimated Completion Date:	Summer 2020
Please provide details of corrective action or explain disagreement.	Although SBE is a small agency with a limited number of individuals who have the required expertise to move program code into the production environment, SBE is exploring how best to implement this recommendation. With a disciplined change management process that includes multiple reviews and approvals, the risks associated with the task of moving code into the production environment is mitigated.		

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