

THE
CARTER CENTER



Georgia 2024
General Risk-Limiting Audit
Limited Observation Report

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Contents

- Executive Summary 3
- Risk-Limiting Audits 4
 - Risk-Limiting Audits in Georgia 4
 - 2024 Batch-Comparison RLA 5
- Findings and Conclusions 5
 - Preparing for the Audit..... 6
 - Observations 7
- Recommendations..... 14

Executive Summary

The aim of the Carter Center’s election observation projects is to build trust in elections. The Center also looks for opportunities to improve election processes through data-informed recommendations. Following the November 2024 presidential election, the state of Georgia conducted a batch-comparison risk-limiting audit (RLA) that confirmed the reported result: the victory in Georgia of Donald J. Trump as U.S. president. The Carter Center was credentialed by the Office of the Secretary of State of Georgia to conduct a limited observation of the audit.¹ Center observers had the same access provided to partisan poll watchers.

Given the relatively large margin of victory and the high level of trust in the result, the Center observed only a small sample of counties rather than conducting a full state-wide observation. The counties observed were chosen for their proximity to Atlanta, size, and the partisan tendencies of their electorates to ensure a balance of Democrat-leaning and Republican-leaning. This limited observation mission primarily served to provide context to the Center’s assessment of Fulton County’s risk-limiting audit. The Fulton County Election Board accredited The Carter Center to observe the 2024 general election process in Fulton County as a separate but related task alongside the monitoring team.²

On Nov. 15, nine Carter Center team members observed the audit in Forsyth, Fulton, Gwinnett, and Paulding counties, using standardized checklists. Three of the counties completed their audits that day. Fulton required an extra day to complete its audit (Nov. 18.), and the Carter Center team observed then as well. Observers collected information on each public step of the process, including room setup, chain of custody, behavior of party poll watchers, the work of the audit boards, the work of the bipartisan vote review panels tasked with interpreting unclear ballots, and the data entry process used to formally register the counties’ audit results with the state.

Though Carter Center observers highlighted several challenges with the implementation of audit practices, they reported that overall, the audit was conducted smoothly and calmly.

¹ The Carter Center defines full or comprehensive election observation missions as ones that assess the entire election process. Limited election observation projects focus more narrowly on one or more parts of the election process in a specific geographical area or areas of a country or state. They require an invitation and/or accreditation. Limited observation projects use standardized assessment criteria and methods and rely heavily on international election standards.

² The Monitoring Team consisted of former election officials, a former Republican Party statewide poll watcher, the former general counsel to the Secretary of State’s Office, and a person with broad experience observing both international elections and Fulton County elections. This team partnered with The Carter Center, which is respected worldwide for its experience observing elections. The purpose of the monitoring was to ensure that Fulton County followed applicable laws, regulations, and procedures in the administration of the 2024 general election; to provide timely, accurate, and impartial statements and reports; and to offer appropriate recommendations, if necessary, that could help improve the election process in the county.

Similar to its findings about the RLA process in 2022, the Center reported that **the main challenges were related to methods used to handle large batches of advance-voting ballots**. In counties that chose to count extremely large batches rather than smaller sub-batches, the process created difficulties in maintaining a clear and documented chain of custody for all ballots during the audit. Large-batch counting practices also resulted in multiple rounds of time-consuming recounts that frustrated audit workers – particularly in Fulton County, where audit workers were required to provide an exact match between hand-counted batches and machine-counted batches – a standard not required by the RLA.

Overall, Carter Center observers found that despite some challenges, the audit process in 2024 was conducted with a high degree of credibility. However, the Center notes that in a more contentious or chaotic election environment, with a large number of poll watchers or public observers, such audit processes might not sufficiently reinforce public trust. For example, the failure to maintain a clear chain of custody at all stages of the audit process could open the door for ballots to be misplaced or tampered with.

Risk-Limiting Audits

Postelection audits are regarded internationally as a best practice for conducting transparent elections. Audits not only bolster the transparency of elections, but they also assess the degree to which processes worked as expected, and they validate the accuracy of final results. Robustly conducted audits boost public confidence in the voting process.

A risk-limiting audit is considered the gold standard for postelection tabulation auditing. The RLA involves the manual examination of a statistically random sample of paper ballots (selected either as individual ballots or batches) to be compared with the tabulator or scanner’s results. The number of ballots reviewed depends on the margin of victory and the predetermined “risk limit” for the audit, which indicates the maximum probability that the audit might fail to detect an incorrect winner.

In general, larger victory margins require an audit of fewer ballots, while smaller margins necessitate a larger sample. If the initial sample does not meet the risk limit, additional ballots are drawn to expand the sample size. The audit concludes when the risk limit is satisfied or, in the most extreme scenario, when all ballots have been audited.

Risk-Limiting Audits in Georgia

Georgia is one of several states that have adopted statewide use of risk-limiting audits. The Carter Center has observed the RLA in the general elections of 2020, 2022, and 2024. The 2020 postelection audit originally was intended to be a sampling RLA, but the margin of victory was so narrow that the ballot retrieval process would have been more onerous than simply counting

all ballots. As a result, a full hand-count audit — that is, a zero-risk limit RLA — was conducted. Two years later, after the November 2022 general election, the race for secretary of state was selected for audit.³ It had a much larger margin of 9% and provided Georgia with its first opportunity to test the process of sampling and conducting a batch-comparison RLA.

For the 2024 general presidential election, Georgia conducted a statewide RLA. Although this was Georgia's third RLA for a general election, some of the issues noted in the Carter Center's 2020 and 2022 observation missions still were present.

2024 Batch-Comparison RLA

The Carter Center conducted a limited observation of Georgia's RLA of the 2024 presidential election. Observations and recommendations are based on audit day observations, supplemented with information from the secretary of state's office and the Fulton County monitoring team. The Center did not observe audit board training conducted before audit day, the packing and transportation of ballots, or the preparation of the ballot manifest. Observers reported on the overall layout and appearance of the audit location during the audit. They watched several audit boards at each location to see the full process from receipt of a ballot container from the check-in area, through sorting and counting, completing the tally sheet, sending the container back to check-in, and finally, data entry.

Findings and Conclusions

Overall, the Carter Center team reported that the audit was conducted smoothly and professionally. Observers noted some minor lapses, particularly in the security of ballot storage and the transparency of data entry. They also reported low public interest and few partisan monitors. The most serious challenge resulted from the methods chosen to handle large batches — 2,000 to 6,000 — of advance-voting ballots. In counties where batches were divided into sub-batches, counting was swift, and observers were able to follow the chain of custody easily. In counties that chose not to divide large batches, counting took considerably more time and observers had a harder time following the process.

Scanners in Forsyth and Gwinnett counties were emptied nightly, and ballots were packaged in small secure packets of several hundred that were distributed to audit boards. Paulding and Fulton scanners were emptied and securely stored when they accumulated more than 1,500 ballots. Paulding reported having a single audit board assigned to count each separately stored sub-batch of about 1,500. They then added up the tallies of the separated sub-batches to get

³ While the audit of the race for secretary of state was conducted by the Office of the Secretary of State (through its Elections Division), the hand sorting and counting of ballots was done independently by election offices in 159 counties.

the count for the whole batch. Fulton did not maintain separately stored ballots and redivided the whole batch to create visually equal stacks of ballots before distributing them to audit boards. As a result, there was no record of the chain of custody beyond the check-in station. An incomplete chain of custody undermines the RLA's ability to provide independent validation of announced results.

In Fulton County, after auditing, the ballots were run through a scanner, presumably to ensure that the final count of ballots matched their original total number of ballots. Difficulties in handling large batches in Fulton were compounded by a local requirement that the audit tally match the machine tally precisely, necessitating multiple recounts of very large batches. Though local election officials in Fulton and Paulding counties require that the audit count precisely match the machine count, RLA processes do not provide for a match against the machine total. Instead, the hand tally is simply entered into the RLA software which determines whether the result has met the risk limit.

A risk-limiting audit is only valid if certain preconditions are met. Notably, the selection of batches of ballots to be audited by hand must be made randomly, and those ballots must be accompanied by a complete, documented chain of custody from voter to auditor.⁴ In Georgia, the random and transparent selection of ballots is assured through the public “seed ceremony” – which involves the generation of a random number that is used as the input to a selection algorithm – and the secretary of state's use of RLA software. Election officials at the county level are to maintain the chain of custody. The chain of custody becomes problematic when the movement of ballots on the audit floor or the procedures for counting cannot be readily tracked, documented, and monitored by observers and election officials.

For future election cycles, The Carter Center recommends that ballots be routinely packaged at advance-voting locations (and not recombined) to ensure a clear chain of custody from voter to audit board and that counting procedures be more standardized across audit boards within a county. Further, the Center recommends that input from counties be solicited to identify best practices for packaging, counting, and documentation. These changes would help ensure the smooth operation and credibility of future RLA processes.

Preparing for the Audit

Carter Center observers were trained on the theory and mechanics of the RLA as well as the batch method in use in Georgia. The training incorporated information from election materials

⁴ A risk-limiting audit requires voter-marked paper ballots, a complete chain of custody from voter to auditor, random selection of ballots or batches to be audited by hand, and a ballot manifest prepared independently of the voting system. See Lindeman, M. & Stark, P.B. 2012 IEEE Security and Privacy, Special issue on Electronic Voting. A Gentle Guide to Risk-limiting Audits. An underlying purpose of the RLA is to increase voter confidence in the outcome of the election. This means that public observers must be able to observe and follow the process – from selection of ballots or batches to be audited through the mechanics of the hand examination of ballots.

shared by the secretary of state's office. Observers also received training on how to complete Carter Center observation reporting forms, as well as guidelines for independent observation that the Center uses in election observations worldwide.

Observations

- **Advance-Voting Ballot Packaging:** Georgia Rule 183-1-14-.02(8) requires that tabulators and scanners be emptied at the end of the day if they have counted more than 1,500 ballots. These ballots must be placed in containers, labeled, and securely stored. At advance-voting locations in Gwinnett and Forsyth counties, scanners were emptied nightly, and ballots were transported to the respective county election offices for secure storage. In Fulton and Paulding counties, scanners were emptied only as required by Georgia rules.

The manner in which ballots were packaged and sealed varied widely across the four counties. At the end of each day of advance voting, Forsyth County packaged its ballots in two or three sealed manila envelopes, with a few hundred ballots in each.⁵ Gwinnett packaged each day's advance-voting ballots in sealed Mylar bags of 400 to 600 ballots each. These strategies for creating manageable sub-batches require that the ballots be handled under secure conditions at the advance-voting location. Fulton used a ballot bag that was nested inside the scanner box, which could be removed from the scanner and sealed with no need for handling individual ballots as was done in Forsyth and Gwinnett counties.

- **Audit Center Atmosphere:** Carter Center observers reported that, like partisan poll watchers, they were able to adequately observe RLA operations even with safety measures like barriers and clearly defined pathways for observers. Few public or partisan poll watchers were present, and no media representatives were seen. There were no disruptions. Transfers of ballot boxes were tracked with a signed chain-of-custody form. The various observer teams described the conduct of the audit as "businesslike," "professionally organized," "efficient," "well-trained," "calm," "orderly," "welcoming," and "enthusiastic."
- **Audit Space Layout:** Carter Center observers reported that all four counties had adequate space around the audit tables for observers to circulate without interference. Only observers with credentials were allowed on the audit floor. Fulton, Forsyth, and Gwinnett counties had signs designating an area for members of the public. In Fulton, Forsyth, and Gwinnett, audit tables were neat and well-organized. There was no food on the tables, and all water or other drinks were in closed containers. All audit boards had a sign to raise to request support from a supervisor, and most requests received prompt attention.

⁵ Scanners divert ballots with a write-in for any office to a separate bin, so Forsyth County was able to package write-ins in a separate envelope each day. When reviewing the contents of the write-in envelope, audit boards had to retrieve ballots with a clean presidential vote and add these ballots to their candidate counts. Gwinnett's write-in ballots were not packaged separately; the audit boards were told to put those in the "no vote" pile.

- **Check-In/Out Station:** The check-in/out station, usually at one end of the audit floor, was cordoned off to prevent unauthorized entry and staffed by at least one person. Ballot containers were held in this area and signed in/out as they were transferred from check-in to an audit board and back again. Audit boards in Forsyth and Gwinnett signaled to get the attention of a runner, who then carried containers between check-in and the audit boards. In Paulding, audit board members personally went to check-in to retrieve containers. In Fulton, runners regularly carried ballot containers to the audit boards.
- **Audit Boards:** Each audit board consisted of a two-person team of election staff. There was a total of 16 audit boards in both Fulton and Paulding, seven in Forsyth, and 11 in Gwinnett. The audit boards were to sort, stack, and count ballots, and then complete a tally form to send to the data entry team.⁶ Audit board members in Forsyth, Gwinnett, and Paulding counties took breaks only when they were between counting containers. In Fulton, supervisors monitored open ballot containers during breaks.
- **Audit Board Training:** Center observers did not observe the training of audit board members, which occurred either before the observers arrived on audit day or on the day before. However, in Gwinnett, a refresher training video was played at the start of audit day. Most election staff had seen this training video over the course of several elections.
- **Vote Review Panels:** Each county had a vote review panel – in most cases staffed by appointed political party representatives – to address any ballot markings for which the audit board could not agree on how to interpret voter intent. However, because most batches were from advance voting using ballot marking devices, there was no need to discern voter intent. Few handwritten absentee-by-mail ballots were audited, and Center observers did not witness any discrepancies being adjudicated.
- **Data Entry:** All counties completed data entry on the audit floor rather than in another room. Fulton and Forsyth staff entered data throughout the day; Gwinnett and Paulding staff entered data at the end of the day. Data entry was visible to observers in Forsyth, Fulton, and Paulding counties. Carter Center observers did not witness data entry in Gwinnett. In Fulton and Forsyth, a single person entered data; Gwinnett and Paulding used a team of two. Observers reported that they could view the data-entry computer screen in Paulding, Gwinnett, and Forsyth but not in Fulton. To ensure transparency, observers should be able

⁶ Tally sheets do not appear to be standardized across counties. Carter Center observers in Forsyth described the tally sheet as asking for the number of ballots for each candidate, write-ins, and “no votes.” This appears to be a change from 2022, when all write-in ballots had to be sent to the vote review panels, which had a list of qualified write-ins. In Fulton, the front of each tally sheet only had four lines for the presidential candidates on the ballots (Kamala Harris, Donald Trump, Jill Stein, and Chase Oliver); audit boards were instructed to hand-write any “no votes” on the back of each tally sheet. After the audit, sheets detailing the count found by the audit boards are submitted to the system provided by the secretary of state to formally record results of each county’s audit.

to see both the tally sheet entered and the computer screen. In addition, data entry should be completed by one person reading the count and another entering it. Overall, observers reported that the data entry process was smooth and free from disruptions.

- **Chain of Custody:** A successful risk-limiting audit requires a complete chain of custody for each ballot, from the time the ballot leaves the voter's hands until it is audited. This requires diligent tracking and logging of all ballot handovers. Forsyth audit boards consistently logged the receipt of ballot envelopes on a chain-of-custody form. Paulding audit boards also generally logged receipt. Audit boards in Gwinnett did not log receipts, although they received ballots in sealed Mylar envelopes. Since the 16 Fulton audit boards were working with stacks of ballots parceled out of a very large batch, they could not individually sign receipts. Their large batches were logged out by the check-in station. Although the process appeared sufficiently secure, the lack of consistency made it difficult for observers to assess the chain of custody.
- **Auditing Outside the Observation Period:** Paulding County decided to conduct a full hand-recount of its ballots and started two days before the designated audit day. As part of this full recount, the RLA batches announced by the secretary of state's office on Nov. 14 already had been audited before the official start of the audit. Tally sheets from these batches were retrieved and uploaded on Nov. 15. Paulding County indicated it had no way of knowing which batches would be selected for the RLA and shared that they were trying to complete the full recount ahead of the Nov. 19 deadline. Conducting the audit outside the designated window prevented observers (including those from The Carter Center) from verifying the quality of the audit. The batches were not recounted in the presence of observers on audit day.
- **Poll Watchers and Other Monitors:** In contrast with the 2020 audit, political parties in 2024 sent few official representatives to monitor the RLA process. Fulton County had only a Libertarian Party poll watcher. Gwinnett County had two Democratic and one Republican poll watchers, Paulding County had only a Republican poll watcher, and Forsyth County had none. The few partisan poll watchers seen wore badges in Gwinnett and Fulton Counties but did not in Paulding County. None of the partisan poll watchers observed were disruptive. One single member of the public was seen in Forsyth. No monitors attempted to talk with any of the auditors.
- **Large-Batch Challenges:** All the large batches audited were from advance voting. With a nationwide trend toward more early voting, Georgia is not alone in facing a batch size

challenge.⁷ As seen in Table 1, other methods of voting produced much smaller batches. Election Day batches generally were smaller, reflecting increasing voter preference for advance voting and the availability of more voting locations. Provisional and absentee-by-mail ballots, both handled at the county elections offices, were packaged in batches of 50 in all four counties observed.

Table 1: Ballot Counts of RLA Batches (by County)

	Fulton	Paulding	Gwinnett	Forsyth
Advance Voting *	2,295	6,534	6,699	8,345
Advance Voting*	5,395	6,552	6,517	7,133
Advance Voting*	6,180	3,805	5,541	7,695
Advance Voting*	0	0	7,167	0
Absentee-by-Mail**	48	48	50	39
Election Day Scanner*	139	0	175	0
Provisional**	0	0	0	0
Totals	14,057	16,939	26,149	23,212

* The ballots cast using this method were batched by scanner over the advance voting period.

** Ballots were hand-batched (up to 50 per batch).

The Carter Center’s reports on the 2020 and 2022 audits noted problems associated with counting large batches of thousands of ballots and recommended steps to reduce batches to more manageable sizes. In 2024, across the four counties, Center observers again noted a variety of strategies for handling large batches.

- Large-Batch Containers and Seals:** There was significant variation in how each county managed the counting of large batches of ballots. In Gwinnett, Mylar bags from each advance-voting location were packed inside a clear, sealed bin and placed on shelves by the check-in table. Bins were unsealed at check-in, and the Mylar bags were distributed among the audit boards. There were no seals on the individual bags, but they had “peel-and-stick” closures. These tamper-evident bags usually had to be cut with scissors by the audit board. After counting, a sticky note with the audit board number was placed on each bag. While ballot security appeared to be well-maintained, the process did not include documentation of the chain of custody, and sticky notes could easily fall off or be removed.

⁷ Nick Corasaniti, “44 Million Voters Have Already Cast a Ballot. Most Voted Early in 2020, Too.” Oct. 29, 2024. Accessed Dec. 14, 2024. <https://www.nytimes.com/2024/10/29/us/politics/early-voting-presidential-election.html?searchResultPosition=4>

In Forsyth County, the elections director reported that she packaged the two or three envelopes received nightly from each advance-voting site. Envelopes were organized by date, tabulator, and voting location. During the audit, envelopes from a single day of advance voting (two or three envelopes with clean ballots and one with write-ins) were distributed to each audit board. As a result, audit boards did not have a consistent or equal number of ballots to count. Each envelope had an inventory number that indicated its origin. The envelopes were glued shut with the adhesive on the envelope. Then a red tamper-evident security sticker with a seal number was placed over the flap. Each audit board had a sheet of stickers to use for resealing throughout the day.

The audit board recorded the seal number — one person read out the number, the other wrote it down and read it back — and then used an envelope opener to slit the top of the envelope. After counting, the audit board resealed the envelope with a new numbered seal sticker (also recorded) before returning the envelope to check-in. The seal did not completely close the envelope but prevented the removal or insertion of ballots. Thus, there were two seal numbers associated with each envelope. This solution ensured that each envelope was sealed and could be clearly tracked from the advance-voting location to the individual audit board and then back into storage.

This in-county uniformity is an improvement compared with the process in 2020 and 2022, when Forsyth ballots were transported in a mixture of sealed containers, banker boxes, and taped cardboard boxes.

Fulton County had the greatest difficulty counting its large batches of ballots (described below in the section on Count Reconciliation). Fulton opened its advance-voting scanners when the total number of ballots cast reached approximately 1,500. The bag inside the scanner was sealed without further handling by election staff and remained sealed until audit day. Since all ballots on the same machine at an advance-voting location were considered one batch for RLA purposes, a batch consisted of several bags of 1,500. When the batch was called for audit, all the bags belonging to the batch were unsealed (chain of custody maintained to this point), and then the batch was reconstituted. From the batch, ballots then were parceled out among the audit boards. As a result, a clear chain of custody from the voter to the audit board was no longer maintained.

- **Counting Process:** The official instruction for the counting process, as conveyed in the training video provided by the secretary of state, was for one audit board member to call out each candidate's name and the other member to place the ballot on a stack. Candidate stacks were to be counted in groups of 10, placing each set of 10 crosswise in another stack. The aim was to have two people confirm the categorization of every ballot and to facilitate the accurate counting of the sorted stacks. This process enabled observers to follow the

process and enabled auditors to double-check if a count was off. Across the four counties, observers noted considerable variation in how the counting process was done.

Of the Paulding County audit boards observed, each used a different method to count and verify ballots, including dividing the batches so that each member separately counted about half of the total ballots and then traded off to verify the other's count. Each team counted an entire batch. Ballots from one batch were not distributed across multiple audit boards.⁸ The Carter Center observers saw one Paulding audit board counting by 50 and another that counted through the entire Election Day batch.

Forsyth audit board members counted stacks of sorted ballots silently and independently. Audit boards in both Forsyth and Gwinnett counties consistently sorted ballots into stacks of 10, in conformity with the video instructions from the secretary of state.

The 16 Fulton audit boards took a variety of approaches to counting. One team sorted the entire stack of ballots by candidate, then one member counted out 10 ballots and handed them to the other member, who stacked them and recorded them on a tally sheet. Each audit board in Fulton County was required to complete its count twice, filling out a tally sheet each time. Observers witnessed three audit boards conduct a third count to reconcile discrepancies between the first and second tally sheets to determine which of the prior totals was correct. In one instance, totals on three successive counts did not match, so election officials gathered all the ballots that were on the floor, dismissed all but eight audit boards, and redivided the batch into eight visually equal stacks to effectively restart the entire batch count. (See Count Reconciliation for more details.)

When ballots from a batch were divided among audit boards (in envelopes, Mylar bags, or loosely, as in Fulton), the individual tally sheets were summed up to create a single batch tally sheet to be uploaded to the RLA software.

- **Count Reconciliation:** Risk-limiting audits are intended to serve as an independent check on the accuracy of the system machine totals rather than the system machine totals serving as a check on the audit's accuracy. An RLA is not supposed to generate new official election totals, except in a close election wherein multiple sampling iterations result in a full hand recount. In such instance, the election totals generated by the full hand count could replace the system machine totals if state law allows. In all other scenarios, the results of the RLA are uploaded without reference to the machine totals, with the software determining whether the risk limit has been met. If the risk limit is met, election administrators and the public can be confident in the accuracy of the machine-generated totals.

⁸ Since Paulding already had counted its large advance-voting RLA batches before the audit day, it is not known whether they used a different strategy for those batches (6,534; 6,552; and 3,805). The sub-batches observed on Nov. 15 were all from Election Day (200, 391, 488, 531, 653, and 1,000 ballots).

However, Georgia has introduced a reconciliation process, matching the ballot count against the machine count generated by the system.⁹ According to training materials from the secretary of state, “The check-in/out clerk will have the total number of ballots in the batch from the ballot manifest, and they should ask the audit team, ‘How many ballots did you count?’ In the event there is a discrepancy, the election superintendent can choose to have the audit team count again.”¹⁰ It appears that the machine count was assumed to be correct; if the two totals did not match, there was assumed to be a problem with the hand count during the risk-limiting audit.¹¹

Gwinnett County sent audit board tally sheets straight to data entry, and so, no reconciliation process was observed. Paulding County audit boards were required to recount the ballots if the RLA hand count and the system count were off even by one. In such cases, the ballots were given to another team for the recount. If the totals still did not match, they were investigated further. The assistant election director noted prior problems with ballots stuck in the scanner. Fulton County, which had the fewest number of ballots to audit, had the most difficulty, likely due to a combination of the requirement to hand-count each stack of ballots twice and to ensure an exact match between the first and second count, as well as, due to the lack of uniform counting procedures across audit boards.

As noted in the section above on the counting process, all audit boards still counting in Fulton conducted a third count of one batch of 5,395 ballots after the second count was off by two ballots. However, the multiple recounts resulted in employee frustration and stress and an extra day of auditing.¹² A Carter Center observer reported Fulton’s recount of the batch of 5,395 noted:

“Audit board #16 was observed during their third count of the same sub-batch. The Supervisor then collected all the sub-batches and audit team number signs and took them all to the back of the room. She announced that there were eight (out of 16) sub-batches that needed to be re-counted. She re-distributed audit team signs and then assigned the numbered bins to the eight teams for them to re-count. Another audit team was re-counting sub-batch #9, which was counted

⁹ Using a batch inventory tool, counties were directed to confirm the ballot total produced by the system. Whether or not this was done consistently is unclear. (Voters do not reliably check the printout from the ballot marking device against the machine output.) Georgia may still essentially be relying on the system to create the ballot manifest. To comply with the fundamental requirements of an RLA, the ballot manifest should be created independently of the system being audited.

¹⁰ GASOS-RLA February 24

¹¹ Of course, reconciliation has some practical utility. In 2022, the hand count was short by 20 ballots in one county and 44 in another. When a recount confirmed these shortages, election authorities went back to the scanners and found ballots accidentally stuck inside.

¹² In contrast, the first batch Fulton counted was an Election Day batch of 139 ballots. It went so smoothly that some staff speculated that they could finish the entire RLA by 3 p.m.

by a different audit team earlier in the day. This team did not re-sort the piles to confirm the candidate's name. They simply counted each pre-sorted pile and completed the tally sheet. Another audit team was re-counting sub-batch #1 that had already been counted by a different team. The goal of the process was to confirm the initial sub-batch counts to reconcile to the overall batch total of 5,395. That is, to achieve a perfect result rather than a perfect process.”

Ballots could be lost, misplaced, or removed in the confusion, particularly in the event of a close election with multiple partisan poll watchers crowding the audit tables.¹³ This counting approach is likely to result in problems with both the chain of custody and the personal safety of audit board members. It also may undermine the transparency and credibility of the audit if partisan poll watchers are unable to consistently follow the movement of ballots during the audit.

Fulton County finished its second day of counting by running all batches through a counter, but it did not appear to cross-check the total against other sources.

- **Uniformity:** Observation across the four counties revealed a wide variety of strategies, procedures, and available election supplies. The four counties observed in 2024 were among the 25 observed by The Carter Center during the 2020 audit. Within each of the four, procedures appeared better organized and more uniformly applied than in 2022, which is a positive sign.

Recommendations

The 2024 election was a best-case scenario for officials in terms of workload, stress, and public attention. There was a clear margin between the presidential candidates and little public interest in the RLA. Overall, the audit was conducted smoothly and professionally. Difficulties with large batches and lapses in ballot security did not have an impact on the audit's perceived accuracy or credibility but could have had real consequences in a close election. *By building on its successes and designing for a worst-case scenario, as in 2020, Georgia can implement a more consistent, robust process that will reduce errors and recounting, minimize employee workload and frustration, and withstand close partisan and public scrutiny.*

Also, routine processes can be scaled up in scenarios where more audits boards are needed, and county personnel must be recruited from outside of elections departments to staff them.

¹³ The secretary of state advises that “a good rule to follow is to allow one monitor from each political party per audit team.” GASOS-RLA February 24. In the Fulton case, a contentious election could result in dozens of partisan poll watchers hovering over the 16 audit tables as loose ballots are distributed, counted, collected, and redistributed.

Audit operations often are affected by competing demands for county election staff's time and attention. In 2020, the audit took place during preparations for the Jan. 5, 2021, U.S. Senate runoff elections. In 2024, election staff in 13 counties, including Fulton, were simultaneously preparing for Dec. 3 runoffs, with advance voting beginning on Nov. 27. All counties had to contend with a new ballot imaging audit and a long list of new State Election Board rules. Similar scheduling challenges can be expected in future elections, and a standard audit process should be designed to function even in the face of foreseeable competing demands.

The only serious challenges that Carter Center observers reported during the RLA resulted from counting very large batches of ballots. State and county elections managers need to map out efficient and uniform processes and thorough training.

The recommendations below are intended to help create a robust statewide system for postelection ballot processing, even in close and contentious elections. Soliciting county input on what works and does not work, disseminating best practices, and making the adoption of standard supplies like ballot storage containers more convenient would strengthen the RLA process.

- **Counties should take a “full life cycle” approach to ballot handling — from voting to creating batches and sub-batches, to packaging and storing, to auditing.** Success is inextricably linked to the initial storage and labeling plan. Post election audits are more likely to proceed smoothly and efficiently if appropriate ballot storage and chain-of-custody practices have been implemented throughout the election process with an eye to facilitating the audit at the end.
- **Counting thousands of ballots in a single batch (as done in Fulton) is slow and prone to errors.** Sealing a large batch at each advance-voting location daily maintains short-term ballot security but adds costs later. Moving loose ballots on audit day complicates maintaining custody and increases the risk of loss. This process can confuse observers, reducing transparency.

Repackaging ballots into smaller units on-site at advance-voting locations ensures strong security, maintains sealed packets until auditing, speeds up counting, ensures documented custody, and prevents accidental loss. While there are trade-offs regarding where to emphasize security, dividing large batches on-site is generally better and more cost-effective.

- **Encourage more uniformity in ballot packaging across the state, building on successful practices observed within each of the four counties compared with 2022.** Convening or surveying county election officials to exchange information and identify best practices might encourage counties to adopt practices that others have found helpful. For example, Forsyth's low-cost envelope and sticker solution worked smoothly and facilitated the chain-

of-custody tracking. Statewide procurement contracts also can be a cost-effective way to obtain supplies that facilitate ballot security. The secretary of state's office supplies numbered zip-tie seals for counties, but such seals are useful only if the ballot containers currently procured by each county can accommodate them.

- **Ballot counting should be conducted consistently statewide, with two people handling each ballot and sorting and stacking by 10s.** Experienced individuals may find this practice slow, but the method reduces the opportunity for error by ensuring that mistakes in counting are caught easily. Third-party observers or poll watchers can easily detect a miscount. Standard operating procedures also would facilitate on-the-job training should it be necessary to increase the number of audit boards and recruit other county employees who are less familiar with elections.
- **Standardize tally sheets to include the names of candidates and authorized write-ins,** with spaces to record the number of blank and spoiled ballots.
- **Counties should be discouraged from counting and recounting batches until their risk-limiting audit hand count totals precisely match the machine counts.** Unless voters in a county demand exact agreement (as may be the case in Fulton), it is sufficient to determine that there are not a significant number of ballots outstanding. The audit software will ultimately determine whether the results of the hand counts meet the risk limit and can serve as an independent validation measure of the accuracy of the announced machine-generated results.
- **Data entry should be done throughout the day and in rooms where observers are present.** Stations should be arranged so that observers can see both the tally sheet and the computer screen (or additional monitor), but with enough distance for data clerk security.
- **On audit day, ballot storage areas should always be secure and guarded,** whether in a separate storeroom or in the check-in area.
- **Given increased demand for complete hand counts at the local level, guidelines for conducting a full hand count audit alongside an RLA could facilitate the proper implementation of both processes and ensure that there are opportunities for partisan poll watchers and the general public to observe.** Assuming there are no legislative changes in the timeline for auditing and certifying results, approval and budgeting for overtime and weekend counting (and standardized counting procedures that eliminate time wasted in recounting) could allow all counting to begin on audit day, which could facilitate counties' conducting of a full hand count and RLA while still respecting the tight timeline for certifying election results. In circumstances where batches are counted before the official dates for conducting the RLA, they should be recounted in the presence of observers on audit day. This would be a duplication of effort but it would serve as a critical transparency measure.