

U.S. Election Assistance Commission  
633 3rd Street NW, Suite 200  
Washington, DC 20001  
Attn: Clearinghouse Division

*Submitted electronically*

April 27, 2026

Re: Voluntary National Election Audit Standards  
Docket ID: EAC-2026-0067

Dear U.S. Election Assistance Commissioners,

On behalf of Verified Voting, I welcome this opportunity for public comment on the U.S. Election Assistance Commission's draft of *Voluntary National Standards for Election Audits – A Practical Guide*. Verified Voting is a national nonpartisan nonprofit organization working to strengthen democracy for all voters by promoting the responsible use of technology in elections. As such, election audits figure prominently in our work. I have an unusual vantage on this draft guide as a two-time (2008 and 2018) executive editor of the *Principles and Best Practices for Post-Election Tabulation Audits*, endorsed by various nonprofit organizations. I can attest that drafting even voluntary standards is not for the faint of heart. We congratulate EAC on presenting an audit standards framework that is cogent, adaptable, and constructive. We believe that this work can materially advance election audit policy discussions throughout the country.

### *General comments*

We find the succinctness and generalizability of the core framework especially helpful. The key values or “topics” of the framework—that election audits ought to be *objective, professional, effective, secure, and accountable*—are thoughtfully chosen. The fourteen standards fall sensibly within those broader values. In under 2½ pages, the presentation of this framework enunciates challenging yet attainable criteria for audit design and evaluation. The framework provides a clear basis for rejecting ill-considered “audit” procedures that fail many or all of these criteria.

Cumulatively, the standards, and the supporting discussion sections, depict wide-ranging election audits not as just more work election officials should do, but as an ongoing public investment in excellence and public confidence. In this connection, we especially endorse the standard that “Audits should be *adequately funded* by applicable public resources” (page 5, emphasis ours) and the point that funding must account for “the time and personnel required to conduct audits” as well as the direct costs (page 12).

We also appreciate the emphasis on public communication and transparency, not only as two distinct standards, but throughout the document. Transparency sometimes is construed as a technical or merely legal requirement, but at root it evokes the value that elections belong to the public. We believe that election audits matter not only for the specific information they provide, but also as an opportunity to communicate with the public—a chance for voters to see election officials working on their behalf. This document admirably supports that purpose through its sample language on how to explain various audit procedures as manifestations of broader standards.

### *Election audits and their goals*

We are curious about the choice not to define election audits, even informally. The executive summary characterizes election audits as “a vital tool for analyzing and enhancing the quality of election administration” (page 1); the introduction adds that they “play a critical role in verifying that elections comply with laws and procedure” (page 2). A few pages later, under the topic of effectiveness, the draft alludes to audits’ “intended goal of providing meaningful and actionable insights that can improve election processes,” and adds (within the efficacy standard) that audits “should be conducted with a clear purpose in mind” (page 6). All these points are helpful, and a brief overarching discussion may help to bring them into focus.

By way of example—and recognizing that definitions can lend themselves to endless arguments—it may be useful to say something like the following early on: “Election audits check various elements of election administration to verify their accuracy and compliance with laws and procedures. Audits may lead to immediate corrections or confirmation, may inform ongoing improvements, or both.” Language like this may help readers and users consider both what election audits have in common and how their specific goals and methods vary. For instance, the insight that “effective audits are timely” (page 6) snaps into focus when one realizes that an audit’s timeliness depends on its specific goals, as ably discussed under Efficacy on page 23.

### *Specific comments*

The example table on page 3 describes a post-election tabulation audit as one in which “a sample of ballots are selected and retabulated, and the results are compared to the originally reported vote totals.” We find that “retabulated” and “retabulation” usually refer to machine recounts, i.e., rescanning some or all ballots using voting system scanners and software. In sharp contrast, most jurisdictions conduct tabulation audits by manually examining a sample of the voter-verified paper ballots (or records), either individually or in batches. Risk-limiting audits definitionally are *required* to manually examine paper ballots. Given that directly examining paper ballots is both the most common practice and widely accepted as best practice, we think it should unambiguously fall within the description of tabulation audits! A simple patch would be to insert the phrase “usually manually,” immediately after “retabulated.” This change would not satisfy all stakeholders, but we think it will benefit most readers.

We have a few thoughts about the discussion of Independence starting on page 14. First, we note the complexity within this standard’s reference to “auditors.” The discussion already goes far to illuminate these nuances. As we construe it, the discussion stipulates that “auditors” can refer both to the people who *supervise and direct* an audit and to the people who *do the work of* an audit. Drawing this distinction at the outset may help readers understand opportunities to ensure independence. For instance, many tabulation audits are designed so that the people reviewing ballots are unaware of the “expected” vote totals. Often, ballot batches are divided among several counting teams, mitigating actual or perceived opportunities to influence the results. Relatedly, random sampling (as discussed later in the document, under Appropriateness) also provides a measure of independence: nobody directly controls what ballots or other records are audited—or not audited.

The discussion of independence opens with this statement: “Independence in election audits means auditors should avoid situations where their impartiality could reasonably be questioned.” This seems unclear to us, partly because it appears to recapitulate the Impartiality standard. We think the point of *independence* is to avoid situations where perceived bias could reasonably be believed to invalidate the audit results. Ideally, independence in audits operates independently (no pun intended) of

impartiality: speculation about auditors' motives has less bite if auditors clearly cannot dictate outcomes.<sup>1</sup>

We suggest greater attention to random sampling under Appropriateness. The draft notes the importance of random sampling to reliably support “general conclusions about items such as ballots or voting equipment” (page 21). Unfortunately, we have observed putatively random sampling methods that do not assure fair samples. The standards document can more clearly convey the importance of valid methods without delving into details. For instance, language like the following could be added: “Random sampling protocols should be carefully designed to ensure fair and representative samples.”

### *Conclusion*

Again, we applaud these voluntary election audit standards. Naturally, we at Verified Voting have many opinions about election audits that are not reflected in the standards, and we think that is appropriate. Voluntary standards work best not as a long series of hurdles to be cleared or avoided, but as guideposts to inform audit design by directing attention to what matters most. This carefully considered framework falls squarely within EAC's mission and will contribute to policy discussions and improvements across the country.

Respectfully yours,

Mark Lindeman  
Policy and Strategy Director  
Verified Voting

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<sup>1</sup> Incidentally, the discussion of impartiality states (page 12): “While it’s not always harmful, unmanaged bias can undermine trust if left unchecked.” We think this was an editing error: “unmanaged” could be deleted.

Two more trivial points: (1) At least in our versions of Word, the text box on page 15 appears to cut off the last line under “Management participation threat” (we manually resized the box to read it). (2) The flow chart on page 23 has a typographical error, “Complie Results” for “Compile Results.”