

Inspection of the Commonwealth Election Commission Ballot Accountability for the 2018 General Election





Office of the Public Auditor

Commonwealth of the Northern Mariana Islands

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June 18, 2019

ELECTRONIC MAIL

Julita Villagomez
Executive Director
Commonwealth Election Commission
P.O. Box 500470
Saipan, MP 96950

Dear Executive Director Villagomez:

This report presents the results of our inspection on the Commonwealth Election Commission (CEC)'s accountability of ballots during the 2018 General Election. The objective of this inspection is to determine if CEC can account for all ballots in the 2018 General Election. If CEC did not account for all ballots, what are the consequences? If the consequences are significant, why were ballots not accounted for?

OPA found that CEC could not properly account for the number of ballots available, used, and unused during the 2018 General Election. OPA met with CEC on March 6, 2019 to discuss preliminary findings and recommendations to improve the accountability of ballots for the 2019 Special Election held on March 23, 2019.

A review of records pertaining to the 2019 Special Election shows an improvement in CEC's processes over ballot accountability. These include documentation showing the accounting of (1) the total ballots ordered, received, and available, (2) all ballots used and unused throughout the duration of the early voting period and election day, and (3) all absentee ballots received, accepted, and rejected on election day. In addition, during the poll worker training, CEC expressed the importance of ballot accountability. OPA commends CEC's effort to improve their processes over ballot accountability.

Very truly yours,

David Blake, CPA
Acting Public Auditor

Enclosure
DB/mp/gt/tr/jm

Cc: Commonwealth Election Commission Members
Honorable Ralph DLG. Torres, Governor
Honorable Edward E. Manibusan, Attorney General
Interagency Audit Coordinating Advisory Group Members

BACKGROUND

On October 19, 2018, the Office of the Public Auditor (OPA) notified the Commonwealth Election Commission (CEC) that an independent inspection would be pursued to assess ballot accountability for the 2018 General Election. This inspection was done in accordance with the standards adopted by the Council of Inspector Generals on Integrity and Efficiency. Please see Attachment 1 for Objective, Scope and Methodology.

According to 1 CMC § 6529, OPA shall assist the Election Commission for the entire election process to prevent and detect fraud and any abuse in the election process until the official results are certified. This includes monitoring the polls during special election, early voting, and election day. In addition, OPA shall assist with (1) the handling of absentee ballots and (2) having in our possession the keys to the ballot boxes used at each polling place in accordance to 1 CMC § 6212(b) and 6219(a). Although the law only refers to the keys for the ballot boxes used at each early voting polling place, OPA has also taken possession of the keys to all ballot boxes used on election day.

OPA, in previous elections, has met with CEC officials to discuss OPA's observations of the election process and determined that a review of CEC's process in the 2018 General Election would (1) result in an improvement of CEC's processes, and (2) provide a report to the public on our work. As a result, OPA initiated an inspection on October 19, 2018 of the 2018 General Election.

RESULTS OF INSPECTION

We found that although CEC provided documentation regarding the total ballots ordered, CEC could not properly account for the total number of blank ballots received from the vendor. In addition, CEC could not properly account for total ballots used and unused throughout the duration of the 2018 General Election because ballot accountability forms were not provided for three polling sites and for the ballots handed to Rota and Tinian Commissioners for over-the-counter requests.

No accountability for the number of ballots received and available

CEC should have accounted for the number of blank ballots received from the vendor and available for the election.

2018 General Election Voter Turnout

From a total of **18,975 registered voters**, an estimated **77 percent** of registered voters cast their ballots in the 2018 General Election.

- Tabulation Results, Commonwealth Election Commission

“Election officials should reconcile the number of blank ballots received from the vendor, the number printed or spoiled, and the number of unused ballots.”

- U.S. Election Assistance Commission

CEC orders 15% more ballots than the total number of registered voters per precinct.

- CEC Executive Director

However, OPA finds that CEC did not have a standard process to verify and document the number of ballots ordered against the number of ballots received, less any spoiled ballots, and finally available for use in the 2018 General Election. The lack of a standard process to account for all ballots received prevents CEC from identifying potential electoral fraud or irregularities.

The documents provided for OPA’s review indicated a total of 23,600 ballots available for distribution. However, the contract between CEC and the vendor showed that CEC ordered a total of 22,000 ballots. CEC could not provide documentation to show the excess number received. According to CEC, an initial quantity of 1,600 blank ballots were hand carried to the CNMI in preparation for absentee requests and the Northern Islands early voting.

OPA conducted a review of documents pertaining to the 2019 Special Election and found that CEC accounted for all ballots received and available for use in that election.

Lack of accountability of total ballots used and unused

According to CEC’s regulations codified at NMIAC § 30-10-436(a), poll supervisors are required to account for the ballots distributed and returned. The sum of unused ballots, official ballots cast, and spoiled ballots should equal the number of ballots distributed and returned. In addition, NMIAC § 30-10-436(b) states that the Commission should require an accounting of returned ballots to ensure that number of ballots returned is the same as the number of ballots that were delivered.

OPA found that CEC did not have an accounting of ballots used during the early voting period. Therefore, CEC could not provide documentation showing the number of ballots available, used, and unused during the early voting period. Although CEC requires poll workers to complete ballot inventory sheets on election day, CEC was not able to provide ballot inventory sheets for precincts 4D, 6 and 7. Of the 13 ballot inventory sheets that were provided to OPA, CEC failed to acknowledge two ballot inventory sheets and it is unknown if CEC reviewed and investigated for anomalies.

In addition, CEC did not document the number of ballots issued to the Commissioners on Rota and Tinian prior to

The CNMI has 7 precincts but due to the number of registered voters, these precincts are divided into 13 polling places. Although there are 13 polling places, there are a total of 16 ballot boxes used on election day due to the large amount of voters in certain precincts:

- 1A San Antonio
- 1B-1 San Vicente
- 1B-2 San Vicente
- 1C Koblerville
- 2 Chalan Kanoa / Susupe
- 3A San Jose / Oleai
- 3B-1 Garapan
- 3B-2 Garapan
- 4A Tanapag
- 4B San Roque
- 4C Capitol Hill
- 4D Northern Islands
- 5-1 Kagman
- 5-2 Kagman
- 6 Tinian
- 7 Rota

the commencement of the early voting period. According to CEC, the Commissioners on both Rota and Tinian were given a total of 10 ballots from each precinct that could be issued to voters as “over-the-counter” (OTC) ballots. Doing so allows voters from other precincts who are present on Rota or Tinian to obtain, cast, and mail in their ballot as an absentee ballot. The process of OTC is also practiced on Saipan wherein ballots are issued to voters who (1) will not be able to vote during the early voting period or on election day, or (2) are unable to wait for an absentee ballot to arrive via mail. All OTC ballots are treated like absentee ballots wherein these ballots must be mailed to CEC by the voter and must be received on election day.

OPA found that CEC lacks policies and procedures or a system to ensure ballot accountability. In addition, CEC did not emphasize to all poll workers the importance of ballot accountability. Furthermore, CEC does not impose consequences for poll workers’ failure to properly account for all ballots delivered to them. During OPA’s observation on the 2018 General Election night, most poll workers were unaware of the forms they were required to complete.

The lack of ballot accountability prevents CEC from identifying potential electoral fraud or irregularities and, as a result, could call into question the integrity of the election process and diminish the public’s trust.

OPA reviewed CEC’s records pertaining to the 2019 Special Election and found that CEC adopted a method to account for (1) the total ballots ordered and received, and (2) all ballots used and unused throughout the duration of the early voting period and election day. In addition, during the poll worker training, CEC expressed the importance of ballot accountability.

OTHER RELATED MATTERS

OPA noted other matters that indicate potential non-compliance with the law that prevents CEC from identifying potential electoral fraud.

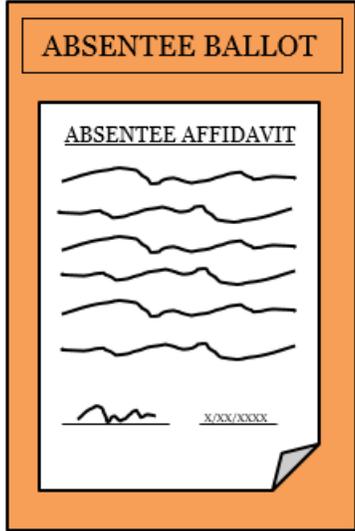
Potential non-compliance with the law

Absentee return envelopes were not properly labelled

According to 1 CMC § 6213(c) and (e), no less than five members of the commission shall initial and print on the

“Election administrators should have a documented plan in place to provide for the management of optical scan or paper ballots, ballot-on-demand ballots, and all ballot stock. This plan should include details pertaining to the audit trail and chain of custody for the ballots with strict control over the ballots and ballot stock at all time.”

- *U.S. Election Assistance Commission*



Ballots cast on election day by voters who previously requested for absentee ballots must be treated as an absentee ballot until it can be confirmed that another ballot was not received from the voter.

- 1 CMC § 6209(c)

return envelope “OK” for absentee ballots accepted and “Rejected” along with a short statement of the reason for rejection for absentee ballots rejected.

According to the CEC Chairman, CEC in prior elections would stamp receive, sign, and indicate whether the ballot was accepted or reasons for rejection on all absentee return envelopes received on election day. The Chairman also stated that unlike prior elections, the Commissioners did not process absentee ballots until after the polling sites were closed for the 2018 General Election. This processing of absentee ballots did not begin until the day after the 2018 General Election. As a result, absentee return envelopes were not signed, reasons for rejection were not indicated, and envelopes were not stamp received.

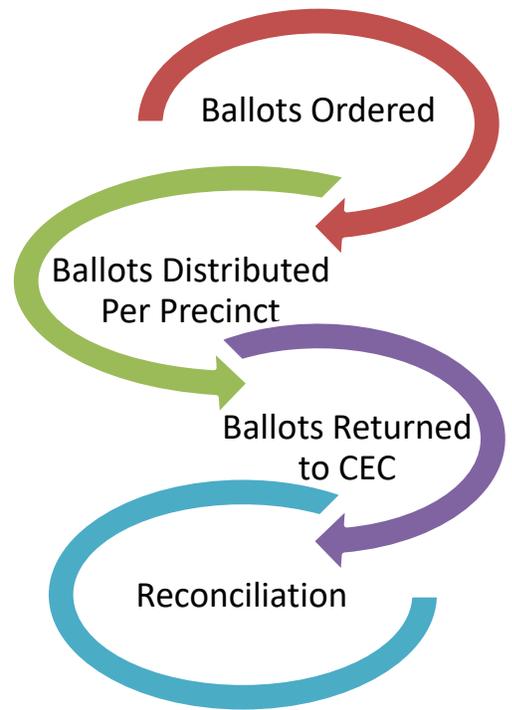
Furthermore, OPA also found that CEC did not have documentation indicating the total number of absentee ballots received, accepted, and rejected on election day.

OPA observed the Commissioners’ review of absentee ballots during the 2019 Special Election and noted that the process carried out by the Commissioners complied with 1 CMC § 6213(c) wherein each absentee envelope was properly marked and signed. In addition, CEC properly documented the number of absentee ballots received, accepted and rejected in that election.

Absentee master list not immediately updated

According to 1 CMC § 6209 Absentee Voting (a)(1) and (2), the Commission shall compile and immediately keep current a list of persons requesting an absentee ballot and a list of persons to whom an absentee ballot was delivered or mailed for public inspection at one government building and on a website without a password requirement. In order to track, verify, and balance the ballot inventory, it is essential to maintain a master list of voters that were issued absentee ballots.

Although CEC maintains a master list of all voters requesting for absentee ballots, over the counter ballots, and those pending administrative hearing, CEC did not ensure that the absentee master list was accurate and immediately updated. As a result, six absentee ballots were rejected.



Sample transmittal factors to consider in a chain of custody for ballot accountability

Source: U.S. Election Assistance Commission

OPA conducted a review of absentee records pertaining to the 2019 Special Election and found that CEC has improved their process of keeping the absentee master list immediately updated at the CEC office but did not immediately update the CEC website.

Ballots cast by absentee applicants on election day not treated as absentee votes

According to 1 CMC § 6209(c), if an absentee voter has yet to receive his or her ballot and is within the Commonwealth on election day, the voter may be allowed to vote. The ballot will then be treated as an absentee ballot until it can be confirmed that another ballot was not received from the voter.

OPA found that there were at least three ballots cast on election day from voters who previously requested for absentee ballots. These ballots were placed into the ballot boxes along with ballots cast from other voters on election day. It is unknown whether CEC confirmed that another ballot was not received from the voter. CEC did not properly train poll workers on how to address voters who were mailed an absentee ballot but showed up to the polls on election day.

OPA conducted an observation of the 2019 Special Election poll worker training and found that CEC communicated the proper procedures for voters who previously requested for an absentee ballot. As a result, election officials applied these procedures in the processing of one absentee voter on the day of election.

Handwritten names on voter roster not treated as provisional ballots

According to 1 CMC § 6208(a), CEC shall provide a list of the eligible voters for each polling place. Only those voters whose names are on the list may vote at that polling place. Any name that is not on the list due to an error may be inserted by CEC prior to the closing of the polls.

“By developing and maintaining an audit trail from the time that ballot envelopes are returned from the post office, through the initial sort, into the opening/separating and review process, at tabulation the audit team can verify that all ballots returned are accounted for—and have been either challenged or tabulated.”

- U.S. Election Assistance Commission



“Although the law only refers to the keys for the ballot boxes used at each early voting polling place, OPA has also taken possession of the keys to all ballot boxes used on election day.”

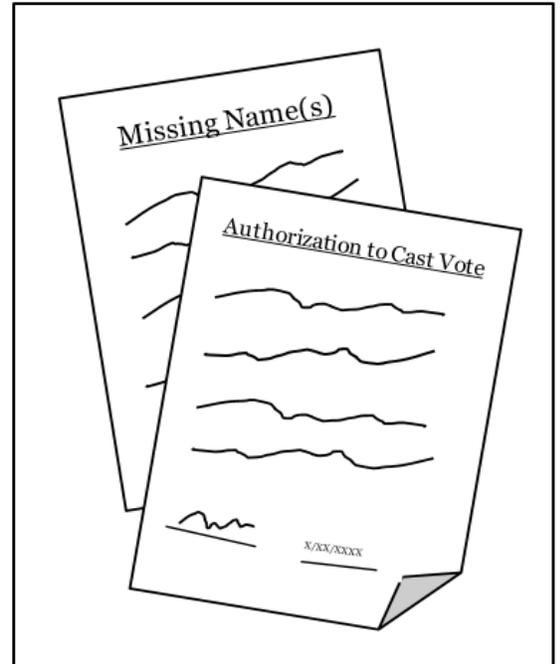
- Office of the Public Auditor

Further, 1 CMC § 6208(h)(3), (4), and (6) states that provisional ballots are permitted to individuals who execute an affidavit under penalty of perjury declaring that they are registered and eligible to vote, but their names were not on the list of the eligible voters for that polling place. If a provisional ballot is cast, the election official at the polling place shall seal the ballot cast and the voter information and transmit it to the Commission for disposition. The Commission shall review all provisional ballots to determine the validity and render a decision no later than 5 calendar days after election day. Lastly, individuals who cast provisional ballots shall be notified of whether their ballot was counted and if not, the reason why the ballot was not counted.

The law does not clearly state how a voter's name will be inserted by CEC if that voter's name was not listed on the roster. CEC has adopted procedures wherein a voter must complete a "Missing Names" form to be reviewed by CEC and if approved, the voter would be issued an "Authorization to Vote," and only then would that voter be allowed to cast a vote. Of the 31 handwritten names in the 2018 General Election, CEC provided documents showing "Authorization to Vote" for only five handwritten names.

According to CEC, these 31 individuals were registered to vote, but the rosters for each of the polling sites were printed before it was updated to reflect all eligible voters. CEC also stated that these are not considered provisional ballots and there were no provisional ballots cast for the 2018 General Election.

In review of the law, it is unclear whether a provisional ballot applies to all handwritten names even after inserted by CEC, or if a provisional ballot is one where a voter is denied an authorization and still insists on casting a ballot. OPA recommends that CEC seek a legal opinion of this question from the Office of the Attorney General to ensure the current practice is in compliance with the law.



If a provisional ballot is cast, the election official at the polling place shall seal the ballot cast and the voter information and transmit it to the Commission for disposition.

- 1 CMC § 6208(h)(3)

Absentee ballots shall be collected from the designated post office once in the morning prior to 11:00am and once prior to the closure of the post office on election day.

- 1 CMC § 6213(1)(i)

CONCLUSION AND RECOMMENDATIONS

CEC's inability to account for all ballots used throughout the duration of the election is very concerning. Democracy is built on fair elections, but if basic ballot accountability is missing, the integrity of the election is diminished. Immediate steps to adopt and implement controls over ballot accountability is necessary to ensure a fair, honest, orderly and impartial election process.

OPA recommends that CEC:

1. Adopt a system that documents the chain of custody of the ballot stock, including receipt, control, transfer and distribution of the ballots.
2. Adopt and implement policies and procedures to ensure:
 - a. proper documentation of ballots received, distributed, spoiled and unused; and
 - b. supervisory review over ballot accountability.
3. Provide adequate training, including testing procedures, to ensure that election officials and poll workers properly carry out their duties and responsibilities.

In addition, OPA suggests that CEC review legislation and propose amendments to the legislature, if necessary. Until that time, CEC must ensure that compliance with the law is met.

OPA had attempted to mitigate the risk of electoral fraud or irregularities by having possession of the keys to all ballot boxes during the entire election process and not only during early elections as required by 1 CMC § 6219. OPA's role in the election process is limited by our need to remain independent so we are able to carry out our Constitutional and statutory mandates to provide audits or investigations into the election process when necessary. As CEC's processes improve, the legislature may determine OPA's assistance in the process is no longer necessary.

AGENCY AND OPA'S RESPONSE

On May 17, 2019, OPA solicited comments from CEC and received their responses on June 4, 2019. See Attachments 2 for agency response.

CEC's Response to the Findings:

Regarding not having any accountability for the number of ballots received and available.

1. CEC partially agrees and stated ballots were inventoried but documentation was either misplaced during their relocation to the Multi-Purpose Center or destroyed by Super Typhoon Yutu.

OPA Comments: During our review, CEC failed to mention that these documents were either misplaced or destroyed by the typhoon.

Regarding the lack of accountability of total ballots used and unused.

2. CEC partially agrees and stated they failed to do thorough inspections of the binders prior to the poll supervisors' dismissal. CEC alludes this oversight to the mental and physical exhaustion of surviving Super Typhoon Yutu.

OPA Comments: We sympathize with the struggles experienced by CEC staff, however, accountability of the election results contributes to the integrity of the election process and is such an important aspect of democracy. CEC must do a better job in holding poll workers and election officials accountable so that CEC can be accountable to the citizens.

Regarding the other related matters – Potential non-compliance with the law.

3. Firstly, CEC partially agrees and stated that one absentee voter was allowed to vote at the polls but his/her ballot was not segregated until it was confirmed that an absentee ballot was not received. Secondly, CEC disagrees with our finding on the accuracy of the absentee voter listing and the treatment of handwritten names as provisional ballots. CEC argues that the listing was accurate and updated and that there were no provisional ballots cast in the 2018 election.

OPA Comments: First, because the absentee voter's ballot was not segregated per the law's requirement, CEC should have properly documented that another ballot from that voter was not received through the mail. Doing so would have instilled trust and integrity in the election process. Second, if the listing was accurate and updated, CEC should have accepted and counted six ballots. In addition, we encourage CEC to get a legal opinion on the applicability of provisional ballots.

CEC's Response to the Recommendations:

CEC stated that policies and procedures over ballot accountability will be updated and formalized. In addition, CEC will enhance the poll worker training to include role-playing and team exercises, with the possibility of including testing procedures.

Lastly, CEC will work with the Office of the Attorney General and the CNMI Legislature to propose amendments to current election laws.

OPA Comments: OPA will conduct a follow up on CEC's implementation of the recommendations during our semiannual review and will make further observations in the next election.

Please see Attachment 3 for Status of Recommendation.

Attachments

OBJECTIVE, SCOPE AND METHODOLOGY

OBJECTIVE

To determine if CEC can account for all ballots in the CNMI 2018 General Election. If CEC did not account for all ballots, what are the consequences? If the consequences are significant, why were ballots not accounted for?

SCOPE

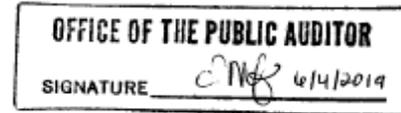
The scope of the inspection will be focused on all ballots ordered, received, used, unused, and spoiled throughout the duration of the CNMI 2018 General Election.

METHODOLOGY

To accomplish the inspection objectives, we:

- Obtained all original documents from CEC pertaining to the election.
- Obtained and reviewed the roster books for all precincts to determine the number of names crossed out for absentee votes, early votes, election day, and the number of names that remained uncrossed.
- Interviewed CEC staff regarding the election process.
- Obtained a copy of CEC's absentee master list to determine the number of absentee ballots mailed out by precinct.
 - Verified whether total mailed absentee ballots match the Voter Absentee Listing total on CEC's website.
 - Accounted for all absentee ballots accepted and rejected by Commissioners by counting the affidavits attached to the return envelope.
- Determined the total count of ballots casted during the early voting period by counting the total number of applications for early voting.
 - Verified if the total count matches the total number of names crossed out on the roster during the early voting period and compared number of early voters crossed out to CEC's early vote daily count.
- Determined the number of provisional ballots, spoiled ballots, and ballots casted on election day.
- Determined if poll workers were able to reconcile without any issues.
- Determined the amount of ballots that were defaced (marked "X") after polling sites were closed.

We conducted our inspection in accordance with the Quality Standards for Inspection and Evaluation as put forth by the Council of the Inspectors General on Integrity and Efficiency. We believe that the work performed provides a reasonable basis for our findings and conclusions.



COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS
COMMONWEALTH ELECTION COMMISSION

May 31, 2019

Mike Pai, CPA
Public Auditor
Office of the Public Auditor
1236 Yap Drive, Capitol Hill
Saipan, MP 96950

Dear Public Auditor Pai:

Thank you for your letter dated May 17, 2019, and for allowing me the opportunity to respond to the draft OPA Report No. 19-XX: Inspection of the Commonwealth Election Commission (CEC) Ballot Accountability for the 2018 General Election.

CEC strives to hold the highest standards and integrity when conducting an election and we value the findings and recommendations from the Office of the Public Auditor (OPA). Before I enumerate and address each of the findings, if I may, CEC was for the most part on track and organized for the original scheduled date of the 2018 General Election. Unfortunately, on October 25, 2018, Super Typhoon Yutu 31W was at its highest peak when it made landfall on the Mariana Islands, just days before the General Election which was originally scheduled for November 6, 2018.

The aftermath of Super Typhoon Yutu significantly impacted our ability to conduct a seamless election. The CEC office sustained water damages, documents and boxes were destroyed, and we had no utility services (water, power, telecommunication). On October 27, 2018, CEC held an emergency meeting with Governor Ralph DLG. Torres to request for the postponement of the General Election to be no more than 30 days from the original date. However, Governor Torres decided through Executive Order No. 2018-19 to postpone the general election by one week. CEC was pressed with time to meet the demands to coordinate, reassess, identify, and relocate some of the original polling places due to damages sustained on several of the polling sites on Saipan and Tinian. In addition, CEC had to move out of its office space and into the Multi-Purpose Center while simultaneously working out of other government offices that had a generator. CEC was provided a generator at the Multi-Purpose Center two-days before early voting began on November 6, 2018.

CEC admits that the 2018 General Election was the most stressful election we've experienced. CEC staff and election officials were, for the most part, experiencing immediate and long term hardship as a result of Super Typhoon Yutu. With that said, I respectfully submit my response to the findings:

Finding: No accountability for the number of ballots received and available.

Response: CEC partially agrees with this finding. CEC has had the practice and method of accounting for ballots ordered and received. CEC ordered a total of 23,200 ballots from Election System & Software for the 2018 General Election. CEC staff performed a physical inventory count of all the ballots as they were

received. 2,400 ballots were hand-carried to Saipan on 09/21/18 and inventoried for absentee ballots, and 21,200 ballots were mailed via UPS by the vendor on 09/25/18 and inventoried for election day ballots. Unfortunately, the inventory count documents were either misplaced during the CEC relocation to and from the Multi-Purpose Center or destroyed in the water damage our office sustained by Super Typhoon Yutu.

Finding: Lack of accountability for the total ballots used and unused.

Response: CEC partially agrees with this finding. Each precinct poll supervisors were provided a ballot inventory sheet that was enclosed in their assigned binders. However, when CEC collected all the binders issued to all poll supervisors it was realized that the ballot inventory sheets were missing for precinct 4D, precinct 6 and precinct 7. CEC has had the practice and method of accounting for total ballots used and unused throughout prior elections. CEC had also conducted mandatory training for all poll workers before the election. Unfortunately, CEC staff and election officials failed to do thorough inspections of the binders that were submitted by poll supervisors before their dismissal. CEC alludes this oversight to the mental and physical exhaustion of surviving Super Typhoon Yutu.

Finding: Non-compliance with law.

Response:

- A) *Absentee return envelopes were not properly labeled.* CEC agrees with this finding. Commissioners did not process absentee ballots until after the polling sites were closed. As a result, absentee return envelopes were not signed, reasons for rejection were not indicated, and envelopes were not stamp received. CEC did not have documentation indicating the total number of ballots received, accepted, and rejected on election day. CEC alludes this oversight to the mental and physical exhaustion of surviving Super Typhoon Yutu.
- B) *Absentee master list not immediately updated.* CEC disagrees with this finding. CEC ensures that the absentee master list is accurate and immediately updated, at all times.
- C) *Ballots cast by absentee applicants on Election Day not treated as absentee votes.* CEC partially agrees with this finding. 1 absentee voters cast their votes with the precinct ballot and poll workers had failed to take possession of their absentee ballots. However, the CEC Executive Director had confirmed that no other ballot was received from the voter.
- D) *Handwritten names on voter roster not treated as provisional ballots.* CEC disagrees with this finding. CEC was unable to update the rosters due to Super Typhoon Yutu, therefore, the 31 individuals who are registered to vote had to be handwritten on the rosters. There were no provisional ballots cast for the 2018 General Election.

OPA Recommendations

- 1) Adopt a system that documents the chain of custody of the ballot stock, including receipt, control, transfer and distribution of the ballots.
Response: CEC created and adopted a system during the 2019 Special Election that documents two chain of custody forms for the ballot stock. One chain of custody form is for the absentee ballots picked up at the post office and must be signed and received in the presence of the Postmaster, OPA staff, a CEC Commissioner, and a CEC staff. The other chain of custody form is the ballot inventory sheet that documents the transfer and distribution of the ballots from CEC to the poll workers for each election precinct.
- 2) Adopt and implement policies and procedures to ensure
 - a) Proper documentation of ballots received, distributed, spoiled, and unused;
 - b) Supervisory review over ballot accountability.

Response: A process was implemented during the 2019 Special Election to meet this recommendation. However, the CEC Executive Director, CEC staff, and CEC Commissioners will meet to update and formalize the existing policies and procedures on ballot accountability.

- 3) Provide adequate training, including testing procedures, to ensure that election officials and poll workers properly carry out their duties and responsibilities.

Response: CEC will continue to provide the mandatory training and election official's pamphlet for all election officials and poll workers. CEC will research and determine whether a testing procedure is necessary or an enhanced training that will include role-playing different scenarios and team exercises. CEC will continue to express the importance of ballot accountability during the poll worker mandatory training.

It is apparent that CEC's performance was seriously affected by Super Typhoon Yutu during the 2018 General Election, and in comparison, it is also evident through OPA's observation that CEC has made a significant improvement in the process of ballot accountability during the 2019 Special Election. CEC values OPA's findings and recommendations and our next action plan is to work closely with the Office of the Attorney General and the CNMI Legislature to propose an amendment to update the election laws, as we continue to seek methods and best practices to maintain ballot accountability.

Again, thank you for giving me the opportunity to respond. Please feel free to contact me directly, for any questions or concerns.

Respectfully,


Julita A. Villagomez
Executive Director

STATUS OF RECOMMENDATION

No.	Recommendation	Status
1	Adopt a system that documents the chain of custody of the ballot stock, including receipt, control, transfer and distribution of the ballots.	Unresolved
2	Adopt and implement policies and procedures to ensure: <ul style="list-style-type: none"> a. proper documentation of ballots received, distributed, spoiled and unused; and b. supervisory review over ballot accountability. 	Unresolved
3	Provide adequate training, including testing procedures, to ensure that election officials and poll workers properly carry out their duties and responsibilities.	Unresolved



**Commonwealth Election Commission
Ballot Accountability for the 2018 General Election
Report No. 19-04, June 2019**

CONSTITUTIONAL MANDATE

Article III, Section 12 of the CNMI Constitution and the Commonwealth Auditing Act (1 CMC, 2301, 7812 et. seq. of the Commonwealth Code) established the Office of the Public Auditor as an independent agency of the Commonwealth Government to audit the receipt, possession, and disbursement of public funds and to perform such other duties as required by law.

REPORTING FRAUD, WASTE, AND ABUSE

- Call the OPA HOTLINE at (670) 235-3937
- Visit our website and fill out our online form at www.opacnmi.com
- Contact the OPA Investigators at 322-3937/8/9
- OR visit our office on 1236 Yap Drive, Capitol Hill