

June 2007

ELECTIONS

Action Plans Needed to Fully Address Challenges in Electronic Absentee Voting Initiatives for Military and Overseas Citizens





Highlights of [GAO-07-774](#), a report to congressional committees

Why GAO Did This Study

The Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) protects the rights of military personnel, their dependents, and overseas citizens to vote by absentee ballot. The Department of Defense (DOD) and others have reported that absentee voting, which relies primarily on mail, can be slow and may, in certain circumstances, serve to disenfranchise these voters. In 2004, Congress required DOD to develop an Internet-based absentee voting demonstration project and required the Election Assistance Commission—which reviews election procedures—to develop guidelines for DOD’s project. In 2006, Congress required DOD to report, by May 15, 2007, on plans for expanding its use of electronic voting technologies and required GAO to assess efforts by (1) DOD to facilitate electronic absentee voting and (2) the Commission to develop Internet voting guidelines and DOD to develop an Internet-based demonstration project. GAO also assessed DOD’s efforts to develop plans to expand its use of electronic voting technologies. GAO interviewed officials and reviewed and analyzed documents related to these efforts.

What GAO Recommends

GAO made recommendations to DOD regarding security, guidance, and plans for electronic voting initiatives and to the Commission on plans to develop the guidelines. DOD and the Commission agreed with these recommendations.

www.gao.gov/cgi-bin/getrpt?GAO-07-774.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Derek Stewart at (202) 512-5559 or stewartd@gao.gov.

ELECTIONS

Action Plans Needed to Fully Address Challenges in Electronic Absentee Voting Initiatives for Military and Overseas Citizens

What GAO Found

Since 2000, DOD has developed several initiatives to facilitate absentee voting by electronic means such as fax or e-mail; however, some of these initiatives exhibited weaknesses or had low participation rates that might hinder their effectiveness. For example, the 2003 Electronic Transmission Service’s fax to e-mail conversion feature allows UOCAVA voters who do not have access to a fax machine to request ballots by e-mail and then converts the e-mails to faxes to send to local election officials. DOD officials told us, however, they have not performed, among other things, certification tests and thus are not in compliance with information security requirements. The 2004 Interim Voting Assistance System (IVAS)—which, DOD reported, enabled UOCAVA voters to *request* and *receive* ballots securely—cost \$576,000, and 17 citizens received ballots through it. The 2006 Integrated Voting Alternative Site (also called IVAS)—which enabled voters to *request* ballots using one tool, by mail, fax, or unsecured e-mail—raised concerns, from Congress and others, that using unsecured e-mail could expose voters to identity theft if they transmit personal data. While this IVAS displayed a warning that voters had to read to proceed, it did not advise them to delete personal voting information from the computers they used. DOD spent \$1.1 million, and at least eight voted ballots were linked to this 2006 IVAS. Both the 2004 and 2006 IVAS were each implemented just 2 months before an election. DOD also has a Web site with links to guidance on electronic transmission options, but some of this guidance was inconsistent and could be misleading. DOD officials acknowledged the discrepancies and addressed them during GAO’s review.

The Election Assistance Commission has not developed the Internet absentee voting guidelines for DOD’s use, and thus DOD has not proceeded with its Internet-based absentee voting demonstration project. Commission officials told GAO that they had not developed the guidelines because they had been devoting constrained resources to other priorities, including challenges associated with electronic voting machines. Furthermore, they have not established—in conjunction with major stakeholders like DOD—tasks, milestones, and time frames for completing the guidelines. The absence of such guidelines has hindered DOD’s development of its Internet-based demonstration project. To assist the Commission, however, DOD has shared information on the challenges it faced in implementing prior Internet projects—including security threats.

GAO observed that DOD was developing, but had not yet completed, plans for expanding the future use of electronic voting technologies. Because electronic voting in federal elections involves numerous federal, state, and local-level stakeholders; emerging technology; and time to establish the initiatives, developing results-oriented plans that identify goals, time frames, and tasks—including addressing security issues—is key. Without such plans, DOD is not in a position to address congressional expectations to establish secure and private electronic and Internet-based voting initiatives.

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Abbreviations

DOD	Department of Defense
FVAP	Federal Voting Assistance Program
HTML	Hypertext Markup Language
IVAS	Interim Voting Assistance System
IVAS	Integrated Voting Alternative Site
NDAA	National Defense Authorization Act
OMB	Office of Management and Budget
PDF	Portable Document Format
SERVE	Secure Electronic Registration and Voting Experiment
UOCAVA	Uniformed and Overseas Citizens Absentee Voting Act
VAG	Voting Assistance Guide

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United States Government Accountability Office
Washington, DC 20548

June 14, 2007

The Honorable Carl Levin
Chairman
The Honorable John McCain
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Ike Skelton
Chairman
The Honorable Duncan Hunter
Ranking Member
Committee on Armed Services
House of Representatives

A citizen's right to vote is one of the hallmarks of a democratic society; yet exercising this right can be a challenge for millions of military personnel and their dependents of voting age who live away from their legal residences (in or outside the United States) and for overseas citizens. These individuals are eligible to vote by absentee ballots in federal elections. This eligibility is established by the Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA),¹ which is administered by the Department of Defense's (DOD) Federal Voting Assistance Program (FVAP). Through this program, DOD provides assistance to UOCAVA voters to facilitate opportunities for them to exercise their right to vote. The absentee voting process requires the potential voter to register to vote, request an absentee ballot, receive the ballot, correctly complete the ballot, and return it to the appropriate local election official. However, DOD and groups that represent voters covered under the act have reported that, because the multistep process of absentee voting relies primarily on mail, in some instances it can take so long to complete that these voters may, in effect, be disenfranchised.

¹Pub. L. No. 99-410 (1986), 42 U.S.C. §§ 1973ff et seq.

To address concerns about mail-based absentee voting, Congress has enacted several laws to promote electronic means for voters to register, request and receive ballots, and transmit voted ballots to local election officials. These laws include (1) the Help America Vote Act of 2002, which established the Election Assistance Commission to serve as a national clearinghouse for election information and to review election procedures; develop voluntary voting system guidelines;² and study, among other things, electronic voting—particularly Internet voting technology; (2) section 1604 of the National Defense Authorization Act (NDAA) for Fiscal Year 2002, which required DOD to carry out a secure³ Internet-based electronic demonstration project⁴ in the general election for federal office in 2002 or 2004; and (3) section 567 of the Ronald W. Reagan NDAA for Fiscal Year 2005, which amended Congress’s mandate for DOD to develop a secure, Internet-based, absentee voting demonstration project—by requiring DOD to implement the project during the first general election for federal office that occurs after the Election Assistance Commission establishes Internet voting guidelines for the absentee voting process.⁵ Section 596 of the John Warner NDAA for Fiscal Year 2007 required DOD to submit, not later than May 15, 2007, a detailed plan to expand the use of electronic voting technology.

Section 596 of the John Warner NDAA for Fiscal Year 2007 also required GAO to review DOD’s electronic and Internet-based voting initiatives. This report assesses (1) DOD’s efforts to facilitate registration, ballot

²Voluntary voting system guidelines are to provide a set of specifications and requirements to be used in the certification of computer-assisted voting systems, both paper-based and fully electronic; states are free to adopt these guidelines in whole or in part or reject them entirely.

³In 1998, DOD had voluntarily initiated a proof of concept called “Voting Over the Internet,” which was a small-scale Internet-based project used in the 2000 elections. DOD’s report on this proof of concept acknowledged that a larger-scale pilot would result in more visibility and potentially attract those with malicious intent to harm the system, but suggested ways to mitigate such future attacks. To address these security concerns and other issues, Congress asked DOD, in 2002, to develop a large-scale, Internet-based demonstration project to ensure a methodical progression from the current mail-based process to a secure, easy-to-use Internet registration and voting system.

⁴One of the primary objectives of the electronic demonstration project was to assess the use of such technologies to improve UOCAVA participation in elections.

⁵The conference report for the bill noted that DOD’s prototype for electronic voting was important and should not be abandoned and encouraged the Secretary of Defense to provide funding to the Commission to advance electronic absentee voting by UOCAVA voters. H.R. Rep. No. 108-767, at 680 (2004) (Conf. Rep.).

transmittal, and voting by electronic means, such as e-mail and fax, for UOCAVA voters and (2) the Election Assistance Commission's efforts to develop Internet absentee voting guidelines and DOD's efforts to develop a secure, Internet-based, absentee voting demonstration project. The report also discusses DOD's efforts to develop plans to expand the use of electronic voting technology in the future.

To address our objectives, we reviewed and analyzed laws, directives, reports, and plans related to DOD's efforts to provide electronic voting capabilities for UOCAVA voters. We also examined the Election Assistance Commission's efforts to develop Internet absentee voting guidelines. We reviewed and analyzed information regarding any benefits and challenges that we, DOD, and others had identified related to DOD's Internet-based electronic demonstration project and new electronic voting initiatives, along with the steps DOD had taken to mitigate those challenges. Additionally, we interviewed and obtained documentation from officials in several offices within DOD, the Election Assistance Commission, selected state and local election jurisdictions, and some independent groups concerned with the interests of UOCAVA voters. We performed our work in accordance with generally accepted government auditing standards, from August 2006 through April 2007. Appendix I provides detailed information about our scope and methodology.

Results in Brief

Since the 2000 federal election, DOD has developed several initiatives to facilitate voting by electronic means such as fax or e-mail; however, some of these initiatives exhibited weaknesses or garnered low participation rates that could limit their effectiveness. DOD introduced the first of three initiatives, an e-mail to fax conversion enhancement to its Electronic Transmission Service, in 2003. This feature allows UOCAVA voters who do not have access to a facsimile machine to send ballot requests, via e-mail, to DOD's Electronic Transmission Service, which converts e-mail messages to faxes and sends them to local election officials.⁶ In return, local election officials can send ballots to the Electronic Transmission Service conversion feature by fax; the conversion feature then converts the fax to an e-mail and sends it to the voter. DOD officials told us, however, that this feature is not in compliance with certain DOD

⁶The Federal Voting Assistance Program reported that some states, by law, allow voting materials to be sent by fax but not by e-mail.

information security requirements,⁷ which include performing and documenting risk assessments and security certification testing. Without such compliance, DOD cannot certify that it has employed the basic practices necessary to apply security measures. DOD officials said that they plan to award a contract to meet the requirements. Also, DOD voluntarily launched a second initiative—the Interim Voting Assistance System (IVAS)—in September 2004, to enable, as DOD reported, absentee voters to request and receive state or territory ballots securely for use in the November 2004 election. DOD spent \$576,000 on this project, but only 17 citizens received ballots through this system—in part, because it was implemented just 2 months before the election. Further, in September 2006, DOD developed, in response to a legislative mandate,⁸ a third initiative—the Integrated Voting Alternative Site (also called IVAS). This site included (1) a ballot *request* only tool—called Tool 1—that enabled voters to request their state or territory ballots from election officials by fax, regular mail, or unsecured e-mail and (2) a ballot *request* and *receipt* tool—called Tool 2—that enabled voters to request and receive their state or territory ballots through a secured server. Officials within Congress, and others, expressed concerns that using the Tool 1 with unsecured e-mail could expose voters to the risk of identity theft. DOD displayed a warning on the site—which voters had to read to continue processing their request—that explained the risks associated with e-mailing ballot requests. While the warning addressed the risks of transmitting personal identification information by e-mail, it did not inform voters of the risks involved in leaving such personal information on the computers they used—especially public computers or those shared by others. DOD officials said they would incorporate lessons learned, such as adding a cautionary statement to future systems to warn UOCAVA voters to remove personal information from the computers they use. DOD spent about \$1.1 million on the 2006 IVAS, but local election officials could link only eight ballots to IVAS Tool 2.⁹ In addition to these initiatives, DOD has established a Web site with links to guidance that provides UOCAVA

⁷DOD, *Interim Department of Defense (DOD) Certification and Accreditation (C&A) Process Guidance*, July 6, 2006.

⁸Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Hurricane Recovery, 2006. Pub. L. No. 109-234 (2006).

⁹FVAP reported that, since ballot requests could be printed and returned through the mail or by fax instead of the secured server, an accurate reporting could not be obtained through Tool 2. FVAP also reported that ballot requests submitted using Tool 1 could not be tracked and reported because voters sent the requests directly to local election officials using their personal e-mail accounts, mail, or fax.

voters with, among other things, information on electronic alternatives to mail for each of the 55 states and territories. These links lead to DOD's 2006 IVAS, the Voting Assistance Guide, news releases, and guidance updates. Our analysis of information on DOD's Web site, however, showed that for 14 of the 55 states and territories, some of the information about the alternatives was inconsistent and could be misleading. For example, for one state, information on three links correctly stated that only overseas military and overseas civilian voters were eligible to receive or return a ballot by fax; however, a fourth link did not include this restriction. As a result, military personnel stationed in the United States, but away from their state of residence, may have incorrectly concluded that they were eligible to vote by fax. While these inconsistencies were not widespread, their mere existence could lead UOCAVA voters to rely on incorrect information and therefore adversely affect the citizens' ability to vote. Agency officials acknowledged these discrepancies and addressed them during the course of our review. We are recommending that DOD improve the security and accuracy of its systems by (1) complying with information security requirements, (2) incorporating lessons learned, such as adding a cautionary statement to future systems to warn UOCAVA voters to remove personal information from the computers they use, and (3) institutionalizing a review process for its online guidance to ensure that information for absentee voters is accurate and consistent. DOD concurred with these recommendations.

The Election Assistance Commission has not yet developed guidelines for Internet absentee voting for DOD's use, and, thus, DOD has not proceeded with developing its secure, Internet-based, absentee voting demonstration project. Specifically, Commission officials stated that they had not yet developed the guidelines because they had been devoting constrained resources to meeting the challenges associated with current electronic voting machines. Furthermore, the Commission has not yet established—in conjunction with major stakeholders, like DOD—tasks, including addressing security and privacy risks; time frames; or milestones for completing the guidelines. Similarly, DOD has not developed the secure, Internet-based, absentee voting demonstration project because, DOD officials said, by law, the Commission must develop Internet absentee voting guidelines for DOD to follow before it can proceed. To support the Commission in developing these guidelines, DOD officials said they gave the Commission a report and an internal DOD document that provides the framework for a system, along with challenges DOD found in its earlier Internet voting projects. These challenges included security threats such as computer viruses, malicious insider attacks, and inadvertent errors that could disrupt system performance. DOD officials stated that, even if the

Internet absentee voting guidelines had been available at the time of our review, the time remaining before the 2008 federal election would be inadequate for developing the secure, Internet-based, demonstration project. We are recommending that the Election Assistance Commission, in conjunction with major stakeholders such as DOD, create an action plan with tasks including actions to address the security and privacy risks associated with Internet voting processes and time frames for developing the Internet absentee voting guidelines. The Election Assistance Commission concurred with our recommendation.

We observed that DOD was developing, but had not yet completed, plans for expanding the use of electronic voting technology for military personnel and overseas citizens, as required by the John Warner NDAA for Fiscal Year 2007. The act requires DOD to submit these plans to Congress, not later than May 15, 2007. Our analysis of existing DOD and Commission documents and our interviews with agency officials show that DOD has not sufficiently involved stakeholders in recent electronic voting efforts—such as its 2006 IVAS. In addition, it has not established interim tasks that address issues such as security and privacy, milestones, time frames, or contingency plans, following the sound management practices used by leading organizations. Implementation of new electronic voting initiatives requires careful planning, particularly in light of the large number of stakeholders, the application of new technology, the remote location of troops, and the lead time required for implementation. Without an integrated, results-oriented plan that involves all stakeholders and identifies, among other things, goals, tasks, time frames, and contingency plans, DOD is not in a position to address congressional expectations to establish secure and private electronic and Internet-based voting initiatives. We are recommending that DOD, in conjunction with major stakeholders such as the Election Assistance Commission and local election officials, develop a comprehensive, results-oriented plan for future efforts that specifies, among other things, tasks including identifying safeguards for security and privacy of all DOD's voting systems—both electronic and Internet-based. DOD concurred with this recommendation.

DOD's and the Commission's written comments are contained in appendixes III and IV, respectively. DOD also provided technical comments, which we incorporated in the final report, as appropriate.

Background

The U.S. election system is highly decentralized and relies on a complex interaction of people, processes, and technology. Voters, local election

jurisdictions (which number over 10,000), states and territories, and the federal government all play important roles in the election process. The process, however, is primarily the responsibility of the individual states and territories and their election jurisdictions. As we reported in our 2006 testimony,¹⁰ states and territories have considerable discretion in how they organize the elections process; this is reflected in the diversity of procedures and deadlines that states and jurisdictions establish for voter registration and absentee voting. Furthermore, these states and jurisdictions use a variety of voting techniques, from paper ballots to faxes and e-mails. We also reported that the voter is ultimately responsible for being aware of and understanding the absentee voting process and taking the actions necessary to participate in it.

The UOCAVA established that members of the military and their dependents of voting age living away from their legal residences (in or outside the United States) and American citizens who no longer maintain a permanent residence in the United States are eligible to participate by absentee ballot in all federal elections. According to DOD, the act covers more than 6 million people. Executive Order and DOD guidance related to the act include the following:

- Executive Order 12642, dated June 8, 1988, made the Secretary of Defense, or his designee, responsible for carrying out the federal functions under UOCAVA, including (1) compiling and distributing information on state absentee voting procedures, (2) designing absentee registration and voting materials, (3) working with state and local election officials, and (4) reporting to Congress and the President after each presidential election on the effectiveness of the program's activities (including a statistical analysis of UOCAVA voters' participation).
- DOD Directive 1000.4, updated April 14, 2004, assigned the Office of the Under Secretary of Defense for Personnel and Readiness responsibility for administering and overseeing the program, and it established the FVAP to manage the program. In 2006, FVAP officials told us that they were authorized a full-time staff of 13 and had a fiscal year budget of approximately \$3.8 million.

FVAP facilitates the absentee voting process for UOCAVA voters; its mission is to (1) inform and educate U.S. citizens worldwide about their

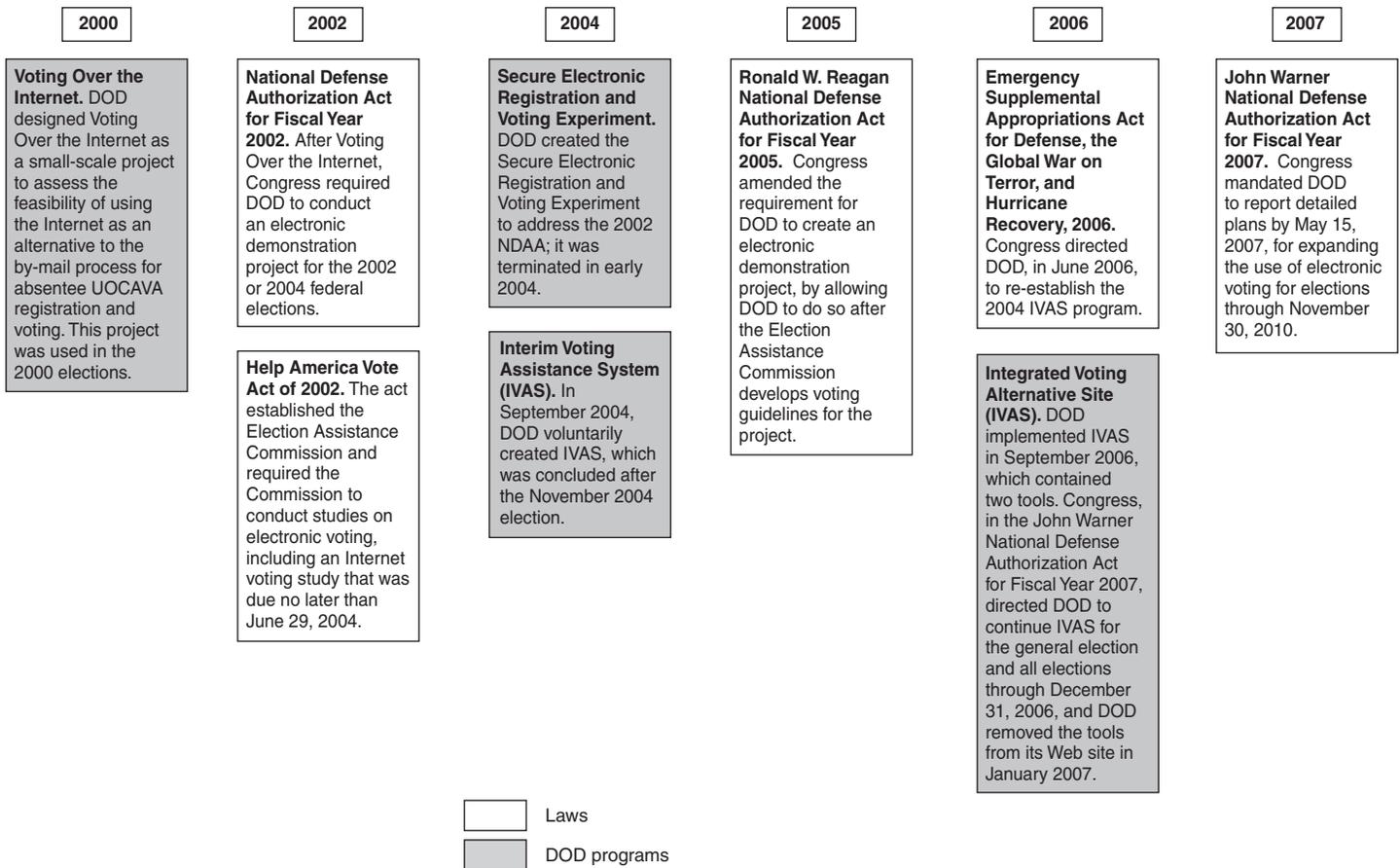
¹⁰GAO, *Elections: DOD Expands Voting Assistance to Military Absentee Voters, but Challenges Remain*, GAO-06-1134T (Washington, D.C.: Sept. 28, 2006).

right to vote, (2) foster voter participation, and (3) enhance and protect the integrity of the electoral process at the federal, state, and local levels. FVAP also, among other things, provides training opportunities for Voting Assistance Officers (service, State Department, and overseas citizen organization officials who carry out the implementation of their respective voting assistance programs); prescribes, coordinates, and distributes voting materials, such as the Federal Post Card Application (the registration and absentee ballot request form for UOCAVA voters); and provides for alternatives to regular mail, including Express Mail and the use of electronic solutions.

The Election Assistance Commission, which was established by the Help America Vote Act of 2002, also contributes to the absentee voting process. The act specifically established the Commission as a national clearinghouse for election information and procedures and assigned it responsibility for developing voting system guidelines for the entire election process. The act also specifies that the development of voluntary voting system guidelines should be informed by research and development in remote access voting, including voting through the Internet, and the security of computers, networks and data storage. In 2005, the Commission issued guidelines that, among other things, addressed gaps in the security measures of prior standards. However, these guidelines do not comprehensively address telecommunications and networking services or their related security weaknesses, such as those related to the Internet. The act also amended UOCAVA to require states to report to the Commission, after each regularly scheduled general election for federal office, on the aggregate number of (1) absentee ballots transmitted to absentee uniformed services voters and overseas voters for the election and (2) ballots returned by those voters and cast in the election. The Commission collects this information through its biennial state surveys of election data.

DOD, the Commission, and organizations representing UOCAVA voters have noted that these voters may effectively become disenfranchised because the multistep process for voting by absentee ballot—which relies primarily on mail—can take too long, especially for mobile servicemembers and overseas citizens or those deployed to or living in remote areas. Congress and DOD have taken action to facilitate the use of alternatives to mail, including electronic means such as fax, e-mail, and the Internet. Figure 1 shows (1) the laws designed to facilitate the use of electronic capabilities for UOCAVA voters and (2) some of DOD’s efforts, either voluntary or in response to a statute, to provide electronic capabilities to these voters during fiscal years 2000 through 2007.

Figure 1: Laws and Some DOD Programs Promoting Electronic Alternatives to Mail for UOCAVA Voters, 2000 through 2007



Source: GAO analysis of Laws and DOD information.

FVAP stated that it implemented the Voting Over the Internet project in 2000 as a small-scale pilot project to provide military personnel and their dependents and overseas citizens covered under UOCAVA the ability to securely register to vote, request and receive ballots from local election officials, and vote via the Internet. DOD voluntarily developed the project as a small-scale proof-of-concept Internet voting project. This project enabled 84 voters to vote over the Internet—the first time that binding votes were cast in this manner.¹¹ While the project demonstrated that it

¹¹UOCAVA voters in Florida, South Carolina, Texas, and Utah, who were away from their legal residences, cast a total of 84 votes from their homes, workplaces, or duty stations on personal computers.

was possible for a limited number of voters to cast ballots online, DOD's report concluded that security concerns needed to be addressed before it could expand remote (i.e., Internet) voting to a larger population.

In 2001, Congress noted that the Voting Over the Internet project had demonstrated that the Internet could be used to enhance absentee voting.¹² To continue the examination of a secure, easy-to-use Internet voting system as an alternative to the regular mail process, Congress mandated, in the NDAA for Fiscal Year 2002, that DOD conduct a large-scale Internet-based absentee voting demonstration project to be used for the 2002 or 2004 federal election. DOD responded to this mandate by creating the Secure Electronic Registration and Voting Experiment (SERVE) for Internet-based absentee registration and voting; SERVE used a system architecture similar to the one used for the Voting Over the Internet project. However, as we previously reported,¹³ a minority report published by four members of the Security Peer Review Group—a group of 10 computer election security experts that FVAP assembled to evaluate SERVE—publicly raised concerns about the security of the system because of its use of the Internet.¹⁴ The four members suggested that SERVE be terminated because potential security problems left the information in the system vulnerable to cyber attacks that could disclose votes or personal voter information. Furthermore, they cautioned against the development of future electronic voting systems until the security of both the Internet and the world's home computer infrastructure had been improved. Because DOD did not want to call into question the integrity of votes that would have been cast via SERVE, the Deputy Secretary of Defense terminated the project in early 2004, and DOD did not use it in the November 2004 election.

¹²The U.S. Senate Committee on Armed Services report on Senate bill 1416 regarding the NDAA for Fiscal Year 2002 noted that the Voting Over the Internet project was an important first step in assessing how to use the Internet to enhance absentee voting; reducing traditional barriers to participation in elections by absentee voters; and providing insight into issues that must be considered for broader use of remote registration and voting through the Internet. (S. Rep. No. 107-62, at 307 [2001]).

¹³GAO, *Elections: Absentee Voting Assistance to Military and Overseas Citizens Increased for the 2004 General Election, but Challenges Remain*, [GAO-06-521](#) (Washington, D.C.: Apr. 7, 2006).

¹⁴Security Peer Review Group, *A Security Analysis of the Secure Electronic Registration and Voting Experiment (SERVE)*, January 21, 2004. The Security Peer Review Group consisted of 10 experts on computer security and voting systems drawn from academia and the private sector. As stated above, the report was written by 4 of the 10 experts.

The points raised in these security reviews are consistent with concerns we raised in our 2001 reports.¹⁵ We found that broad application of Internet voting presented formidable social and technological challenges. In particular, we noted that challenges to remote Internet voting¹⁶ involve securing voter identification information and ensuring that voters secure the computer on which they vote. We also reported that because voting requires more stringent controls than other electronic transactions, such as online banking, Internet voting systems face greater security challenges than other Internet systems. Furthermore, we found that remote Internet voting was recognized as the least protective of ballot secrecy¹⁷ and voter privacy¹⁸ and was most at risk from denial of service and malicious software, such as computer viruses. While opinions of groups considering the pros and cons of Internet voting were not unanimous, we found that they agreed in principle on major issues, including considering security to be the primary technical challenge for Internet voting.¹⁹ Because of serious concerns about protecting the security and privacy of the voted ballot, we concluded that Internet-based registration and voting would not likely be implemented on a large scale in the near future.

In the Ronald W. Reagan NDAA for Fiscal Year 2005, Congress amended the requirement for the Internet-based absentee voting demonstration project by permitting DOD to delay its implementation until the first federal election after the Election Assistance Commission developed guidelines for the project. The conference report for the act²⁰ stated that,

¹⁵GAO, *Elections: Voting Assistance to Military and Overseas Citizens Should be Improved*, GAO-01-1026 (Washington, D.C.: Sept. 28, 2001) and *Elections: Perspectives on Activities and Challenges Across the Nation*, GAO-02-3 (Washington, D.C.: Oct. 15, 2001).

¹⁶Various approaches to Internet voting are possible, ranging from the use of Internet connections at traditional polling stations to the ability to remotely vote from anywhere (remote Internet voting). An intermediate step along this range is an option referred to as “kiosk voting,” which uses conveniently located voting terminals provided and controlled by election officials.

¹⁷Ballot secrecy refers to protecting the content of the vote.

¹⁸Voter privacy refers to protecting the voters’ ability to cast votes without being observed. In poll-site voting, voter privacy is generally ensured by election officials and observers. However, we reported that remote Internet voting would not protect voters’ physical privacy, leaving them open to the risk that they might be coerced (through threats, bribery, or other forms of pressure).

¹⁹Other challenges that affect implementation of Internet voting include the costs of the voting method versus its benefits and the availability of Internet technology to voters.

²⁰H.R. Rep No. 108-767, at 680 (2004) (Conf. Rep.).

although Congress recognized the technical challenges of Internet voting, SERVE was an important prototype that should not be abandoned.

DOD Initiatives Assist UOCAVA Voters, but Certain Weaknesses May Limit Their Effectiveness

Since the 2000 federal election, DOD has established several initiatives as alternatives to the by-mail process to facilitate voter registration and ballot request, receipt of a ballot, and submission of a voted ballot by electronic means—such as fax and e-mail—for UOCAVA voters. These include the Electronic Transmission Service’s fax to e-mail and e-mail to fax conversion enhancement (hereafter referred to as the e-mail to fax conversion feature); the 2004 Interim Voting Assistance System (IVAS); the 2006 Integrated Voting Alternative Site (also called IVAS); DOD’s online voting assistance guidance; and online forms to register, request, receive, or submit ballots. While these efforts provide valuable guidance, services, and information to UOCAVA voters, some of them had limited participation rates or exhibited weaknesses in security, consistency, and accuracy that might hinder their use and effectiveness. DOD officials have acknowledged these weaknesses and they began taking action to address them during the course of our review.

Electronic Transmission Service’s E-mail to Fax Conversion Capability Facilitates Transmission of Voting Materials but Does Not Fully Comply with Information Security Requirements

The electronic transmission service is a fax forwarding system, established by FVAP in 1990, that allows UOCAVA voters and state and local election officials, where permitted by law, to fax election materials to each other. These voters and election officials can use this service and do not have to pay long distance fees for faxing out of state, because DOD provides the service through a toll-free line. In 2003, after discussions with Mississippi state officials and a Mississippi National Guard unit, FVAP added the e-mail to fax conversion capability to its electronic transmission service. These officials asked FVAP for help in transmitting voting materials because, by state law, Mississippi allowed only faxing as an electronic means of transmission—a capability that the Guard unit would not have while it was deployed to Iraq.²¹ The e-mail to fax conversion feature allows UOCAVA voters who do not have access to a facsimile machine to send ballot requests, via e-mail, to DOD’s Electronic Transmission Service, which converts e-mail attachments to faxes and sends them to local election officials. In return, local election officials can send ballots to the Electronic Transmission Service conversion feature by fax; the conversion

²¹The FVAP reported that some states, by law, allow voting materials to be sent by fax but not by e-mail.

feature then converts the fax to an e-mail attachment and sends it to the voter.

FVAP stated that it notifies states and territories whenever it converts an e-mail containing voting materials to a fax, or vice versa, so that the state or territory can decide whether or not to accept it. Table 1 shows Electronic Transmission Service activity for the conversion feature for 2004 and 2006.

Table 1: Electronic Transmission Service E-mail to Fax Conversions for 2004 and 2006

	Years	
	2004	2006
E-mails converted to fax—sent from citizens to local election officials		
Voted ballots	67	53
Federal post card applications and remaining ballot materials	389	190
Subtotal	456	243
E-mails converted to fax—sent from local election officials to citizens ^a		
Federal post card applications and remaining ballot materials	153 ^b	182
Subtotal	153^b	182
Total	609	425

Source: DOD.

^aFVAP officials stated that the local election officials who send e-mails to the Electronic Transmission Service conversion feature use it to store ballots that will be sent to UOCAVA voters, through DOD, at some future date.

^bFVAP noted that for the 2004 elections the Electronic Transmission Service conversion feature received 61 e-mails from local election officials which they converted to 153 faxes to citizens covered under UOCAVA. FVAP explained that this allowed one local election official to send one e-mail with a PDF attachment to the Electronic Transmission Service, which would then get converted to a fax and sent to multiple UOCAVA voters per the local election official's instructions. PDF means Portable Document Format; it is a file format that is used to view electronic copies of paper documents, which allows an exact copy of the paper document.

Although FVAP has made progress in assisting servicemembers to transmit voting materials with the e-mail to fax conversion enhancement, FVAP officials told us they have not fully complied with certain information security requirements in the Interim DOD Information Assurance Certification and Accreditation Process.²² This guidance

²²DOD, *Interim Department of Defense (DOD) Certification and Accreditation (C&A) Process Guidance*, July 6, 2006.

requires DOD components, among other things, to implement controls and to certify and accredit such e-mail systems.

FVAP officials initially stated that the information security guidance did not apply to the conversion feature; they saw it as an enhancement to the original Electronic Transmission Service's fax system. During the course of our review, however, FVAP officials said they consulted with officials responsible for DOD's information assurance certification and accreditation and concluded that the requirements did, in fact, apply. These officials stated that, by the end of fiscal year 2007, they plan to award a contract to obtain services to meet the information security requirements. The FVAP officials further stated that, while they do not have the required documentation—such as risk assessments or certification tests and accreditations—they have taken some measures to ensure security. We note that the statement of work for FVAP's April 29, 2005, contract for the Electronic Transmission Service recognizes the sensitivity of the data associated with election materials and includes provisions for certain security functions, such as ensuring that adequate steps are taken to prevent unauthorized access or manipulation of the data. Until FVAP performs and documents the security assessments and certifications, however, it has not taken all the necessary measures to secure its system and comply with DOD's information security requirements.

Federal law includes a number of separate statutes that provide privacy protections for certain information. The major requirements for the protection of personal privacy by federal agencies come from two laws: the Privacy Act of 1974²³ and the privacy provisions of the E-Government Act of 2002. Section 208 of the E-Government Act of 2002²⁴ requires agencies, among other things, to conduct privacy impact assessments before developing, upgrading, or procuring information technology that collects, maintains, or disseminates personally identifiable information. DOD developed departmentwide guidance—the DOD Privacy Impact Assessment Guidance—for implementing the privacy impact assessment requirements mandated in the E-Government Act of 2002. In this guidance, DOD directs the components to adhere to the requirements prescribed by the Office of Management and Budget (OMB)—Guidance for

²³5 U.S.C. § 552a.

²⁴Pub. L. No. 107-347 (2002).

Implementing the Privacy Provisions of the E-Government Act of 2002.²⁵ FVAP officials stated that they had not conducted a privacy impact assessment for the Electronic Transmission Service's e-mail to fax conversion enhancement, but they told us that a privacy impact assessment will be done as part of the previously mentioned contract to meet information security requirements. A privacy impact assessment would identify specific privacy risks to help determine what controls are needed to mitigate those risks associated with the Electronic Transmission Service. Furthermore, building in controls to mitigate risks could ensure that personal information that is transmitted is only used for a specified purpose. FVAP noted that when information is sent by e-mail, the conversion feature retains the following information: full name, fax number, city, state, zip code, and e-mail addresses. FVAP's Electronic Transmission Service retains this personally identifiable information both to provide transmission verification or confirmation to users and to comply with election document retention requirements under the Civil Rights Act of 1960.²⁶

DOD's Electronic Ballot Request and Receipt Initiatives Had Limitations in Participation and Security

In September 2004, just 2 months prior to the election, DOD voluntarily implemented what it reported as a secure electronic system for voters to *request* and *receive* ballots—the Interim Voting Assistance System (IVAS)—as an alternative to the traditional mail process. IVAS was open to active duty servicemembers, their voting age dependents, and DOD overseas personnel who were registered in a state or territory participating in the project²⁷ and enrolled in the Defense Enrollment Eligibility Reporting System—a DOD-managed database that includes over 23 million records pertaining to active duty and reserve military and their family members, retired military, DOD civil service personnel, and DOD contractors. DOD had limited IVAS participation to UOCAVA voters who were affiliated with DOD because their identities could be verified in the Defense Enrollment Eligibility Reporting System. Voters obtained their state or territory ballots through IVAS by logging on to a special Web site

²⁵OMB, *Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002*, September 26, 2003. (M-03-22).

²⁶Every officer of election must retain and preserve all election records and papers for certain federal elections for a period of 22 months from the date of the election. Civil Rights Act of 1960, § 301, 42 U.S.C. § 1974.

²⁷States and territories participating in the 2004 IVAS included Kansas, Kentucky, Maryland, Mississippi, Montana, New Mexico, South Carolina, the Virgin Islands, and Wisconsin.

and then requesting ballots from their participating local election jurisdictions. After the local election officials approved the requests and the ballots were finalized, IVAS notified voters via e-mail that the ballots were available to download and print. DOD reported that 108 counties in eight states and one territory agreed to participate in this 2004 IVAS; however, only 17 citizens downloaded their ballots from the site during the 2004 election. FVAP officials noted that participation was low, in part because this IVAS was implemented just 2 months before the election. FVAP further reported that many states did not participate—for a variety of reasons, including state legislative restrictions, workload surrounding regular election responsibilities, and lack of Internet access. FVAP officials noted that this system, which was maintained through the conclusion of the election, cost \$576,000.

In September 2006—again, just 2 months before the next general election—FVAP launched a follow-on Integrated Voting Alternative Site, also called IVAS, in response to a June 2006 legislative mandate to reestablish the 2004 IVAS. This 2006 IVAS expanded on the 2004 effort, by providing information on electronic ballot request and receipt options for all UOCAVA citizens in all 55 states and territories. It also provided two tools that registered voters could access through the FVAP Web site, using DOD or military identification, to request or receive ballots from local election officials. As with the 2004 IVAS, local election officials used information in these tools to verify the identity of UOCAVA voters who used them.²⁸ The first tool—called Tool 1—contained a ballot *request* form only, accessed through DOD’s Web site, which voters could fill out and download to their computers. Voters could then send the downloaded form to the local election officials either by regular mail, fax, or unsecured e-mail, per state or territory requirements. FVAP officials reported to Congress that no information on the number of users was available on the use of Tool 1 because the department was no longer involved in the process once the voter downloaded the ballot request and they, essentially, had no visibility into what transpired directly between the voter and the election officials.

²⁸Verification was made by the use of WebGuard, which determines the status of an individual enrolled in the Defense Manpower Data Center’s Defense Enrollment Eligibility Reporting System database using that individual’s name, Social Security number, and date of birth. Ballot requests saved and downloaded to the voter’s computer for voters who used Tool 1 and those requests sent to the election officials using Tool 2 both include text indicating the forms were generated via IVAS.

The second tool—called Tool 2—provided a ballot *request* and *receipt* capability for voters, similar to the 2004 IVAS, which also allowed voters to fill out ballot request forms online, send them to local election officials through a secure line, and receive their state or territory ballots from the local election officials through a secured server. Again, no voted ballots were transmitted through this IVAS system given that it was not designed for that purpose. Absentee voters, instead, would return voted ballots, outside of IVAS, in accordance with state law. Tool 2 had a tracking feature which showed that 63 voters had requested ballots through the system. Of these, local election officials approved and made their state or territory ballots available to 35 UOCAVA voters. However, of the 35 sent out, local election officials reported that only 8 voted ballots²⁹ were traced back to the IVAS Tool 2, in part because this IVAS was implemented just 2 months before the election. DOD reported that the total cost for the 2006 IVAS was about \$1.1 million, and given that the tools were used only to request or receive ballots for the November 2006 elections,³⁰ DOD removed the tools from FVAP's Web site in January 2007. Table 2 compares and provides additional details on the two tools.

²⁹FVAP reported that, since ballot requests could be printed and returned through the mail or by fax instead of the secured server, an accurate reporting could not be obtained through Tool 2. FVAP also reported that ballot requests submitted using Tool 1 could not be tracked and reported because voters sent the requests directly to local election officials using their personal e-mail accounts, mail, or fax.

³⁰Congress directed DOD, in June 2006, to reestablish the 2004 IVAS program. Congress also directed, in October 2006, that DOD continue IVAS for the general election and all elections through December 31, 2006.

Table 2: Comparison of Integrated Voting Alternative Site Tools 1 and 2 for Election Year 2006

	Tool 1	Tool 2
Developer/ contractor	Defense Manpower Data Center	Merlin International, Incorporated's PostX
User(s)	<ul style="list-style-type: none"> Uniformed servicemembers Servicemembers' dependents Overseas DOD employees and contractors 	<ul style="list-style-type: none"> Uniformed servicemembers Servicemembers' dependents Overseas DOD employees and contractors Local election officials
Tracking	<ul style="list-style-type: none"> System is not able to track ballot request forms sent to local election officials because users submitted their Federal Post Card Applications directly to local election officials using their personal e-mail accounts. System can provide only how many times it was accessed. 	<ul style="list-style-type: none"> System is able to track ballot request forms sent to local election officials; local election officials reported that they received 8 voted ballots.^a PostX reported 63 ballot requests were submitted to the system; 35 were approved—29 out of 35 blank ballots were viewed by voters on the system.
Step-by-step process	<ul style="list-style-type: none"> Registered voters use a unique DOD identifier or credential to log in to the IVAS tool. Voters complete the automated Federal Post Card Applications, without their signature, to request a ballot. Voters save the Federal Post Card Applications to their computers as PDF files. Voters e-mail the Federal Post Card Applications over an unsecured Internet line to local election officials; voters may also fax or mail the Federal Post Card Applications to local election officials—depending on state or territory procedures. 	<ul style="list-style-type: none"> Registered voters use unique DOD identifier or credential to log in to the IVAS tool. Voters complete the automated Federal Post Card Applications, without their signature, to request a ballot. Voters save the Federal Post Card Applications to the secure server and the system sends a notification to the local election officials of completed ballot requests. Local election officials receive automated e-mails with notification of new ballot requests and log onto the secure server to access the Federal Post Card Applications. Local election officials approve applications and upload blank ballots onto the secure server. Voters log onto the secure server and fill out ballots. Voters print completed ballots. Voters submit voted ballot directly to local election officials, in accordance with state law. Local election officials confirm voted ballot receipts. Voters log on to check confirmation of voted ballot receipts.

Source: DOD information.

^aFVAP reported that, since ballot requests could be printed and returned through the mail or by fax instead of the secured server, an accurate reporting could not be obtained through Tool 2. FVAP also reported that ballot requests submitted using Tool 1 could not be tracked and reported because voters sent the requests directly to local election officials using their personal e-mail accounts, mail, or fax.

Officials within Congress, and others, have expressed concerns that voters could be exposed to a heightened risk of identity theft if they used Tool 1 to send voting materials that contain personally identifiable information (including Social Security number, date of birth, and address), by unsecured e-mail. FVAP officials acknowledged in their December 2006

report to Congress³¹ that Tool 1 was less secure, but said (1) DOD was providing access to a capability that states already provide,³² (2) most states and territories only required the last four digits of the Social Security number on the ballot requests,³³ and (3) Tool 1 displayed a cautionary statement that voters had to read to go on with the request process; this cautionary statement explained the risk associated with e-mailing ballot requests and that the government assumed no liability if voters did so. While we confirmed a cautionary statement related to the transmission of personal data did exist for Tool 1, it did not advise voters, after submitting their ballot request, to remove voting materials that they have stored on their computers. For example, voters using Internet cafes overseas could have been subject to identity theft if they did not delete their personal information from the computer and a subsequent user gained access to the stored file. FVAP officials acknowledged that users were not advised of the risks of storing personal voting information on their computers, and these officials stated that they will incorporate lessons learned, such as adding a cautionary statement in any future ballot request system.

Online Voting Guidance Is Useful but Some Inconsistencies Exist in the Links

In addition to these initiatives, DOD also has established the FVAP Web site,³⁴ which contains information on FVAP programs and links to assist UOCAVA voters in the voting process. Specifically, these links access FVAP's online guidance, including several versions of FVAP's biennial Voting Assistance Guide, shown in figure 2.

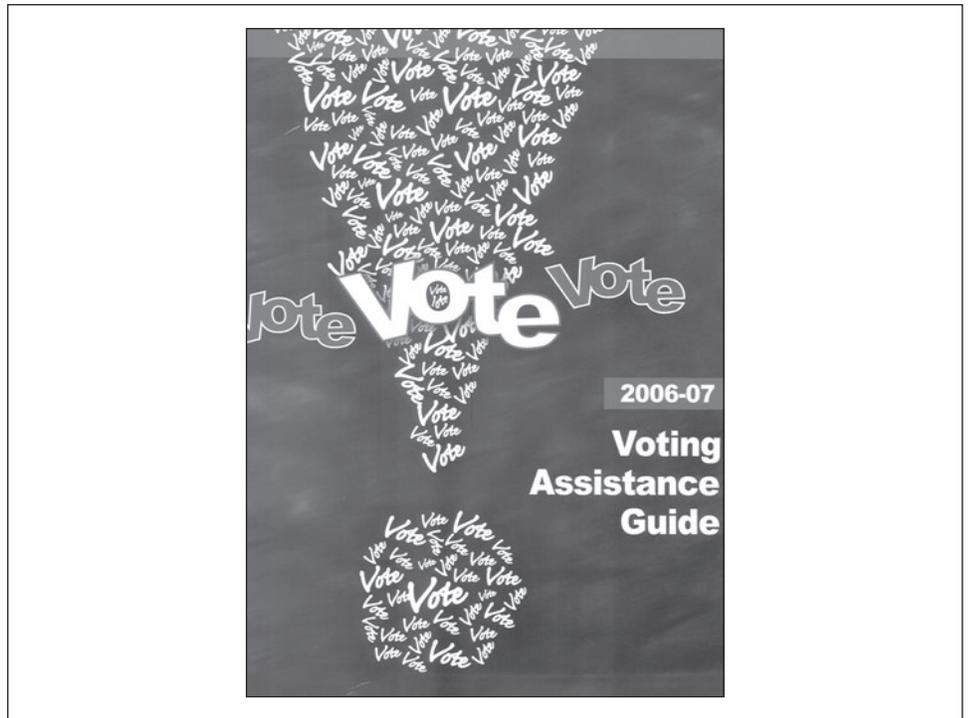
³¹DOD, *Report on IVAS 2006, As Required by Section 596 of the National Defense Authorization Act for Fiscal Year 2007*, December 2006.

³²FVAP reported that states and territories allowing e-mail of the ballot request include Alaska, Colorado, Illinois, Indiana, Iowa (2006 only), Minnesota, Mississippi, Montana, North Carolina, North Dakota, Oregon, Puerto Rico, South Dakota, Virginia, Washington, and Wisconsin.

³³As reported by FVAP, 7 states require the full Social Security number, 41 require the last 4 digits or driver's license, and 7 do not require the Social Security number.

³⁴DOD established this Web site in 1995.

Figure 2: DOD's 2006-2007 Voting Assistance Guide



Source: DOD.

This guide tells the UOCAVA voter how to register, request a ballot, receive a ballot, and vote the ballot electronically—including by e-mail or fax—where state or territory law allows this. One link on FVAP's Web site had a full-text version of the guide, so that a Voting Action Officer³⁵ or other user could download and print the entire guide and use it to provide assistance to absentee voters from various states and jurisdictions. Another link goes to a Web page containing "State-by-State Instructions," where two additional links—one a PDF guide, the other an HTML version³⁶—are provided for each state or territory. This allows voters to read or print off only their own state's or territory's instructions and to

³⁵Service Voting Action Officers, for example, are responsible for voting assistance operations within their service.

³⁶PDF means Portable Document Format; it is a file that is used to view electronic copies of paper documents, which allow an exact copy of the paper document. HTML means Hypertext Markup Language and is used to structure and format documents to be displayed on the World Wide Web.

have a choice of formats.³⁷ Another link goes to the Integrated Voting Alternative Site—this site provides information for the 55 states and territories regarding the electronic ballot request and receipt options available to UOCAVA voters. FVAP’s Web site also has another link to News Releases, which contains updates on changes to the guidance, including changes to state laws that affect UOCAVA voters. Finally, a link goes to FVAP’s Voting Assistance Guide Errata Sheets—this contains changes that have been made to the archived Voting Assistance Guide since its last printing.

Our review of the FVAP Web site, however, revealed inconsistencies in some of the information about electronic transmission options that the voters could access through different links on the site. Our analysis specifically showed that, while not widespread, for 14 of the 55 states or territories, some of the guidance regarding requirements for electronic transmission was inconsistent and could be misleading, as the following examples illustrate:

- For the state of California, we found that three of the FVAP links correctly stated that only overseas military and overseas civilian voters were eligible to receive or return a ballot by fax; a fourth link, however, did not include this restriction. As a result, military personnel stationed in the United States, but away from their state of residence, might conclude—incorrectly—that they were eligible to vote by fax. FVAP officials acknowledged this discrepancy and updated the information reached from the fourth link on January 25, 2007, to reflect the fact that uniformed servicemembers must be residing or deployed overseas to be able to receive and send ballots by fax.
- For the state of Colorado, we identified a news release that was issued on October 18, 2006, announcing a new initiative to allow uniformed servicemembers deployed outside the United States to request, receive, and return absentee ballots via e-mail. One other FVAP link reflected this change; however, four other links did not capture this change. FVAP officials acknowledged this discrepancy, updated two of the links, and

³⁷The Executive Branch’s “Access Board,” which consists of cabinet-level officials from twelve federal agencies, among others, developed standards to implement section 508 of the Rehabilitation Act, which required federal agencies to have electronic information that is accessible to people with disabilities on government Web sites. FVAP stated that they provide access to an HTML version of their Voting Assistance Guide on their Web site to comply with this act. They also provide a PDF format of the Voting Assistance Guide for UOCAVA voters.

issued an errata sheet on January 22, 2007. FVAP officials did not update the third link—the 2006-2007 Voting Assistance Guide accessed through the publications link on their Web site—stating that it was considered an archive document and was not intended for update. However, DOD did not clearly identify this link as an archived document; as a result, this link could mislead voters who relied on it. FVAP officials later acknowledged that the archived version of the 2006-2007 Voting Assistance Guide could have been labeled better, and eventually deleted this version from their Web site.

Appendix II provides details on the inconsistencies we found on FVAP's Web sites for 14 states and identifies the links, along with DOD's responses regarding each. Under internal control guidance, organizations are to apply policies and procedures consistently.³⁸ As noted previously, while the inconsistencies were not widespread, the fact that inconsistencies exist at all could lead UOCAVA voters—especially busy voters residing or deployed in remote locations—to rely on incorrect information and therefore adversely affect their ability to vote. Agency officials acknowledged these discrepancies and addressed them during the course of our review.

Online Voting Forms

In addition, FVAP administers two online forms, (1) the Federal Post Card Application, which allows absentee voters to register to vote or request ballots; and (2) the Federal Write-in Absentee Ballot, which allows absentee voters to vote even if they have not yet received the absentee ballot they requested from their state or territory. The Federal Post Card Application has been online since 1999, in PDF format, and is postage-free within the U.S. mail system when appropriate markings, provided on FVAP's web site, are used. The online Federal Post Card Application allows voters to download a PDF version to their computers to complete, e-mail, print, sign, and send to their local election official via mail. Some state and local election officials we spoke with indicated that the online version of the Federal Post Card Application has many benefits because it is easy to fill out and read, and it provides sufficient space for the voter to write in.

³⁸GAO, *Assessing Internal Controls in Performance Audits*, GAO/OP-4.1.4 (Washington, D.C.: September 1990) and *Standards for Internal Control in the Federal Government (Exposure Draft)*, GAO/AIMD-98-21.3.1 (Washington, D.C.: December 1997).

A UOCAVA voter can also use the Federal Write-in Absentee Ballot as a backup ballot when the state or territory has not sent a regular absentee ballot in time for the voter to participate in the election. On October 21, 2004, just a few weeks before the national election, FVAP issued a news release announcing the electronic version of the ballot as an emergency ballot. The Ronald W. Reagan NDAA for Fiscal Year 2005 amended the eligibility criteria in UOCAVA³⁹ to allow states and territories to accept the Federal Write-in Absentee Ballot under a broader range of circumstances. Prior to the change, a UOCAVA citizen had to be outside of the United States, have applied for a regular absentee ballot early enough to meet state election deadlines, and not have received it from the state. Under the new criteria, the Federal Write-in Absentee Ballot can be used by military servicemembers and their dependents stationed in the United States, as well as by military personnel, their dependents, and citizens living overseas.

Absence of Internet Absentee Voting Guidelines Has Hindered Development of the Mandated Internet-Based Absentee Voting Demonstration Project

The Election Assistance Commission has not yet developed the Internet absentee voting guidelines, and because it is required by law to develop them for DOD's use in the secure, Internet-based, absentee voting demonstration project, DOD has not moved ahead with the project. Commission officials told us that they have not yet developed the required Internet absentee voting guidelines because the Commission has been working on other priorities—including standards for electronic voting machines, challenges associated with these electronic voting machines, and a process for certification and accreditation—and it lacks the resources to work on the Internet absentee voting guidelines or the mandated study of the issues and challenges for Internet technology at the same time. Although the Internet voting study is now underway, the Commission has said that it will not be completed until September 2007 and thus does not have the results it needs to establish time frames or a plan for developing the guidelines. Regarding the demonstration project, DOD officials stated that they had not taken action to develop this project because the Ronald W. Reagan NDAA for Fiscal Year 2005 requires the Commission to develop the guidelines first. DOD officials stated that, in an effort to assist the Commission in developing the Internet absentee voting guidelines, they have provided information on prior Internet voting efforts, along with challenges associated with these Internet voting efforts and views on how to mitigate those challenges.

³⁹Pub. L. No. 108-375 § 566(c) (2004).

The Commission Has Not Developed Internet Absentee Voting Guidelines because of Other Priorities, Constraints on Resources, and Lack of DOD Information

Commission officials stated that they have not developed Internet absentee voting guidelines because the Commission and the organizations that would normally provide assistance to it are directing their constrained resources to other priorities. This includes addressing challenges associated with electronic voting machines and establishing a process for certification and accreditation. Additionally, the Help America Vote Act of 2002 requires the Commission's Technical Guidelines Development Committee to assist the Executive Director of the Commission in developing voluntary voting system guidelines.⁴⁰ The act also requires the Director of the National Institute of Standards and Technology to provide the Development Committee with technical support in developing those guidelines, including research and development related to computer and network security, voter privacy, remote access voting (including voting through the Internet), and voting fraud.

Commission officials told us, however, that the Development Committee has not been able to work on Internet absentee voting guidelines for UOCAVA voters because it had other priorities and constraints on its resources.⁴¹ In light of the Development Committee's low priority for working on the Internet absentee voting guidelines, officials from the Commission asked officials from the National Institute of Standards and Technology to assist with developing the guidelines. However, officials from the National Institute of Standards and Technology said that they could not provide support because they also lacked sufficient resources at the time. Commission officials told us that, at the time of our review, the National Institute of Standards and Technology was also using its resources to work with the Development Committee on the current voluntary voting guidelines and would not have sufficient resources to work on Internet absentee voting guidelines until after July 2007.

Additionally, Commission officials stated that they were waiting for DOD to provide information that describes the type of system around which the

⁴⁰These guidelines provide a set of specifications and requirements to be used in the certification of computer-assisted voting systems, both paper-based and fully electronic, and are voluntary—that is, states are free to adopt them in whole or in part or to reject them entirely.

⁴¹For example, Commission officials told us that the Development Committee is working on updates to the Voluntary Voting System Guidelines that were established in 2005. These guidelines will become effective December 2007. The guidelines focus primarily on electronic voting machines and ballot counters, but not on Internet voting systems for UOCAVA voters.

guidelines should be developed. DOD officials, however, stated that they gave the Commission reports that provided the framework for the Internet-based absentee voting system they envisioned. Specifically, these DOD officials told us that they provided the Commission, in 2004, with a report on their 2000 proof of concept for Internet-based voting called “Voting Over the Internet,”⁴² and in March 2006, they provided the Commission with an internal DOD document assessing the terminated SERVE project. DOD and Commission officials told us that they had not communicated in depth on the guidelines and the DOD system before our review.

The Election Assistance Commission Has Started a Study as a Precursor to the Internet Absentee Voting Guidelines

To gain a better understanding of the Internet voting environment, in September 2006, the Commission started an Internet voting study as a precursor to developing the Internet absentee voting guidelines. The Help America Vote Act of 2002 required the Commission to conduct this study to determine the issues and challenges presented by incorporating communications and Internet technology into elections, including the potential for election fraud, and to issue a report no later than June 29, 2004. However, the Commission did not meet this reporting date. Commission officials told us that they were unable to complete the study sooner—or even begin it—because of the resource constraints they have worked under since the Commission’s inception, and because they were working on other priorities. They noted, for example, that under the act, the Commission was to be established by February 26, 2003, but the Commissioners were not appointed until almost a year later, in December, 2003. They also told us that, although 23 employees were allocated to the Commission, they had to build up staff gradually, starting in January 2004, by hiring two employees each month. Accordingly, Commission officials testified in June 2004⁴³ that, as a result of these constraints, the Commission was able to meet only some of its mandates, such as developing the 2005 Voluntary Voting System Guidelines. As a result, the Commission was not able to conduct the Internet voting study in a timely manner.

⁴²Department of Defense, *Federal Voting Assistance Program: Voting Over the Internet*, June 2001.

⁴³*Statement of U.S. Election Assistance Commission before the U.S. House Of Representatives, Committee on House Administration*, dated June 17, 2004.

Commission officials stated that the Internet voting study, which was underway during the course of our review, includes several case studies to monitor current Internet voting usage and electronic transmission of ballots. The four states participating in this part of the study are Florida, Montana, South Carolina, and Illinois. The study also includes (1) a survey of UOCAVA voters to collect information on their level of interest in electronic voting and (2) a conference to gather states' experiences on topics such as Internet voting, electronic transmission of ballots, security risks for voting systems, and verification of voters' identities. Commission officials told us that they plan to issue a final report on the Internet voting study in September 2007.

The Commission Does Not Have a Plan for Assessing Security Issues and Developing Internet Absentee Voting Guidelines

The Ronald W. Reagan NDAA for Fiscal Year 2005 did not establish a deadline by which the Commission was to complete the Internet absentee voting guidelines, and the Commission has not set time frames for itself, primarily because it has been working on guidelines for current voting systems. Additionally, as stated previously, the Commission has not completed the precursor Internet voting study to identify critical issues and challenges such as those related to security and privacy. Also, it has not established a plan, in conjunction with major stakeholders like DOD, to develop appropriate guidelines for Internet voting with specific tasks that would address security risks such as those identified in its study and other security evaluations and reports, as well as time frames and milestones.

In previous reports, we have noted that leading organizations develop long-term results-oriented plans that involve all stakeholders and identify specific tasks, milestones, time frames, and contingency plans;⁴⁴ this practice is also embodied in the underlying principles of the Government Performance and Results Act of 1993.⁴⁵ Similarly, without a plan for the UOCAVA Internet absentee voting guidelines—including specific tasks, time frames, milestones, necessary resources, and alternatives—the Commission cannot inform Congress, FVAP, and local election officials when it will meet the mandate to develop the required guidelines. As we

⁴⁴GAO, *Executive Guide: Effectively Implementing the Government Performance and Results Act*, GAO-GGD-96-118 (Washington, D.C.: June 1996) and *Military Readiness: Navy's Fleet Response Plan Would Benefit from a Comprehensive Management Approach and Rigorous Testing*, GAO-06-84 (Washington, D.C.: Nov. 22, 2005).

⁴⁵Pub. L. No. 103-62 (1993).

previously noted, some technologies may not yet be mature enough to support Internet voting. Therefore, the plan for developing Internet absentee voting guidelines may require an incremental approach that reflects emerging solutions to security and privacy challenges, as well as changing views on acceptable levels of risk and cost.

DOD Has Not Developed a Secure, Internet-based, Absentee Voting Demonstration Project

Similarly, DOD has not developed a secure, Internet-based absentee voting demonstration project, as Congress mandated in the Ronald W. Reagan NDAA for Fiscal Year 2005. DOD reported that the principal objective of the Internet-based electronic demonstration project was to assess the use of such technologies to improve UOCAVA participation in elections. The department planned to conduct the project during the first general election for federal office after the Commission has established Internet voting guidelines for the project. However, DOD has not moved forward with the electronic demonstration project because, by law, the Commission must first develop the Internet absentee voting guidelines.

DOD officials stated, as mentioned previously, that they provided information to assist the Commission in developing the guidelines, and Commission officials acknowledged that DOD had provided them with a report on “Voting Over the Internet,” DOD’s assessment of its November 2000 Internet-based voting project, in 2004—the first year of the Commission’s operation. DOD also provided the Commission with an internal document that contained information on its SERVE project. However, Commission officials told us that they did not receive the SERVE document until June 2006. This document discussed challenges DOD identified with Internet voting, which included security threats such as computer viruses, malicious insider attacks, and inadvertent errors that could disrupt system performance.

In 2001, we also identified several challenges to Internet voting, such as privacy and security.⁴⁶ As previously mentioned, we reported that broad application of Internet voting faced formidable challenges, including the difficulty of providing adequate voter privacy—that is, protecting the voter’s ability to cast a ballot without being observed. We further reported that, although not unanimous on all issues, groups considering the pros and cons of Internet voting were in consensus in identifying security as the primary technical challenge for Internet voting. We also reported that,

⁴⁶[GAO-01-1026](#); [GAO-02-3](#).

because of the security risks involved, Internet voting would not likely be implemented on a large scale in the near future. Moreover, DOD officials told us that even if the Commission had developed Internet voting guidelines at the time of our review, DOD would not have been able to develop a secure, Internet-based, electronic demonstration project in time for the 2008 presidential election. DOD officials said that—depending on the Internet voting guidelines provided by the Commission—the final system design, full development, testing and deployment phases would take an estimated 24 to 60 months. Furthermore, deployment of any system requires participation of the military services, which have many additional, competing priorities that may cause delays in deployment. Given that less than 17 months remain before the November 2008 election, FVAP officials said there is insufficient time to advertise and launch the Internet-based electronic demonstration project.

DOD Was Developing Plans to Expand the Use of Electronic Voting Technology in the Future, but Sound Management Practices Are Key

We observed that DOD was developing, but had not yet completed, plans to expand the use of electronic voting technology for UOCAVA voters use in federal elections through November 2010, as required by the John Warner NDAA for Fiscal Year 2007. DOD officials told us that they anticipated providing the plans to Congress, in accordance with the act, by May 15, 2007. Because electronic voting initiatives for the absentee voting process (fax, e-mail, and Internet) involve numerous stakeholders at the federal level—including DOD and the Commission—as well as the various state and local levels, developing a plan is key. Implementation of new electronic voting initiatives requires careful planning, particularly in light of the remote location of troops, the application of new technology, and the lead time required for implementation. As DOD develops these plans, employing a comprehensive strategic approach that incorporates sound management principles could provide a framework for DOD’s plans. Our analyses of DOD and Commission documents and our interviews—including those with officials from these agencies, organizations representing UOCAVA voters, and state and local election officials—show that DOD did not obtain sufficient stakeholder involvement in planning its recent electronic voting initiatives—the 2004 and 2006 IVAS initiatives. In fact, Commission officials mentioned that DOD’s recent initiatives took a “top down” approach and did not seek input from the Commission or from local jurisdictions during the planning stage. DOD officials noted that both the 2004 and 2006 IVAS initiatives were planned, designed, advertised, and implemented just months before those two elections. In the case of the 2006 IVAS, however, the department reported that it developed the system within 79 days of passage of the mandate—June 2006—and noted that it was in fact responsive to that mandate. The Commission and state and

local election officials noted that the aggressive schedules for these latest electronic initiatives did not allow sufficient time to enable full participation, training, and dissemination of information on the efforts. Additionally, at the time of our review, DOD officials said they had not yet established interim tasks that address issues such as security and privacy, milestones, time frames, and contingency plans.

The principles of sound management used by leading organizations and embodied in the Government Performance and Results Act of 1993⁴⁷ provide a methodology to establish a results-oriented framework for DOD to develop its detailed plans. Such a framework would provide a firm foundation for DOD's long-term plan for electronic voting initiatives. Some of the key management principles include (1) involving stakeholders when defining the mission and outcomes, (2) identifying specific actions and tasks, such as monitoring and assessing security of the initiatives, (3) developing schedules and time frames for tasks, and (4) evaluating the overall effort, with specific processes to allow for adjustments and changes. Furthermore, as we reported in one of our executive guides, leading organizations plan for a continuous cycle of risk management. This includes determining needs, assessing security risks, implementing policies and controls, promoting awareness, and monitoring and evaluating controls.⁴⁸ Combined with effective leadership, these principles provide decision makers with a framework to guide program efforts and the means to determine if these efforts are achieving the desired results.

In its December 2006 report to Congress on IVAS,⁴⁹ DOD stated the following:

- Development of a long-term strategic plan was necessary to ensure that all related initiatives were effectively integrated, but this was dependent on having sufficient time to assess, improve, and evaluate new or evolving electronic alternatives.
- Major recommendations for its future electronic voting projects would include, for example,
 - recognizing the variation in state and local laws, procedures, and systems;

⁴⁷Pub. L. No. 103-62 (1993). [GAO/GGD-96-118](#).

⁴⁸GAO, *Executive Guide: Information Security Management, Learning From Leading Organizations*, [GAO/AIMD-98-68](#) (Washington, D.C.: May 1998).

⁴⁹DOD, *Report on IVAS 2006*.

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- identifying and mitigating actual and perceived risks, by educating people about risk management practices; and
 - building consensus among key stakeholders.

As stated previously, Commission officials told us that, for recent initiatives, DOD did not seek input from the Commission or local jurisdictions during the planning stage of these efforts. Without a proactive, integrated, long-term, results-oriented plan that involves all major stakeholders; includes goals, interim tasks—such as identifying security risks and addressing privacy concerns—milestones, time frames, and contingency plans; and follows the sound management practices used by leading organizations, DOD is not in a position to address congressional expectations to establish secure and private electronic and Internet-based voting initiatives.

Conclusions

It is imperative that the 6 million Americans who are covered under the Uniformed and Overseas Citizens Absentee Voting Act have the opportunity to exercise their right to vote—one of the hallmarks of a democratic society. The fact that time is an issue with absentee voting by regular mail has led many to look toward electronic and Internet voting, which represent the next generation of voting technology, as alternatives. While these alternatives may expedite the absentee voting process, they are more vulnerable to privacy and security compromises than the conventional methods now in use. Electronic and Internet voting require safeguards to limit such vulnerabilities and prevent compromises to votes from intentional actions or inadvertent errors. However, available safeguards may not adequately reduce the risks of compromise. To date, the Election Assistance Commission has not assessed the risks or possible safeguards for Internet voting, nor has it developed corresponding guidelines that define minimum Internet voting capabilities and safeguards to be considered by the election community. Furthermore, electronic and Internet-based absentee voting can be challenging for UOCAVA voters, who reside at multiple locations across the globe. These voters are also registered to vote in thousands of local jurisdictions across 55 states and territories that employ varying levels of technology—from paper ballots to faxes and e-mail. DOD faces significant challenges in leveraging electronic and Internet technology to facilitate this complex, global absentee voting process. Delays in developing guidelines and a demonstration project have resulted in two presidential elections passing without significant progress in moving toward expanded use of electronic and Internet absentee voting. DOD officials told us it is now too late in the cycle to implement significant changes before the 2008 election. The challenges of

coordinating among numerous stakeholders—including DOD, the Commission, and state and local election officials, as well as organizations representing UOCAVA voters—are substantial, and, to date, efforts to involve stakeholders in the planning stage of DOD’s recent initiatives have fallen short. This delay has left an expectation gap between what Congress required and what has been accomplished so far. Several steps would have to be taken to overcome these challenges, including better coordination between the Commission and DOD regarding their complementary roles in developing Internet voting guidelines and the mandated demonstration project. Unless the Commission and DOD move in a timely manner to assess the technology risks, develop guidelines that address the risks, coordinate among election stakeholders, and establish and execute prudent plans, they are unlikely to meet the expectations of Congress and military and overseas voters to establish a secure and private electronic and Internet-based UOCAVA voting environment.

Recommendations for DOD

To improve the security and accuracy of DOD’s electronic and Internet initiatives, we recommend that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to take the following four actions:

- Comply with the information security requirements in the DOD Certification and Accreditation Process guidance.
- Incorporate lessons learned into plans for future systems such as those we identified, including adding cautionary statements to future ballot request and receipt systems to warn UOCAVA voters to remove personal data from their computers.
- Institutionalize a process to review online UOCAVA guidance to ensure that DOD provides accurate and consistent information to UOCAVA voters.
- Create an integrated, comprehensive, long-term, results-oriented plan for future electronic voting programs that specifies, among other things, the goals to be achieved along with tasks including identifying safeguards for the security and privacy of all DOD’s voting systems—both electronic and Internet. The plan should also specify milestones, time frames, and contingencies; synchronize them with planned development of the Commission’s guidelines for Internet voting; and be developed in conjunction with major stakeholders—including state and local election officials, the Election Assistance Commission, overseas voting groups, and each of the armed services. The plan should also include initiatives that will be done well in advance of federal elections, to allow adequate time

for training and dissemination of information on the options available to UOCAVA voters.

Recommendations for the Election Assistance Commission

To improve the Election Assistance Commission's efforts to comply with the direction from Congress to develop the Internet absentee voting guidelines, we recommend that the Commission take the following two actions:

- Determine, in conjunction with major stakeholders like DOD, whether the Commission's 2007 Internet voting study and any other Commission efforts related to Internet or electronic voting are applicable to DOD's plans for Internet-based voting, and incorporate them where appropriate.
- Develop and execute, in conjunction with major stakeholders—including state and local election officials and DOD—a results-oriented action plan that specifies, among other things, goals, tasks, milestones, time frames, and contingencies that appropriately address the risks found in the UOCAVA voting environment—especially risks related to security and privacy.

Agency Comments and Our Evaluation

In written comments on a draft of this report, DOD concurred with our recommendations to (1) comply with the information security requirements, (2) incorporate lessons learned into plans for future systems—to include adding cautionary statements to warn UOCAVA voters to remove personal data from their computers, (3) institutionalize a process to review online UOCAVA guidance, and (4) create a comprehensive, results-oriented, long-term plan for future electronic voting initiatives. The department said that it will contract for services to comply with the information security requirements and will incorporate identified lessons learned into future registration, ballot request, and ballot receipt systems. The department said that it has already streamlined its online guidance by, among other things, eliminating the archived "Publications" version of the Voting Assistance Guide entirely; it will also establish a revised review process for online information. DOD noted that these changes will reduce the possibility of human error and simplify the review and verification process of online information. Finally, DOD stated that it was in full support of a long-term, comprehensive plan for future electronic voting projects that would allow for sufficient time to involve the major stakeholders, train, and disseminate information and ultimately serve UOCAVA voters. The department said it looked forward to working on this multiyear project plan in cooperation with the Election Assistance Commission, the National Institute of Standards and Technology, and

other major stakeholders. It further stated that FVAP, the Commission, and the National Institute of Standards and Technology are scheduling a meeting to lay the groundwork for the plan. DOD's comments are reprinted in appendix III. DOD also provided technical comments, which we incorporated in the final report, as appropriate.

In its written comments, the Election Assistance Commission concurred with our recommendations to (1) determine the applicability of the Commission's 2007 Internet voting study and other Commission studies to DOD's plans for Internet-based voting, and (2) develop and execute a results-oriented action plan to provide guidelines that appropriately address the risks found in the UOCAVA voting environment. The Commission stated that it has already met with FVAP and the National Institute of Standards and Technology and agreed to develop a time line for creating the UOCAVA guidelines. The Commission's comments are reprinted in appendix IV.

We are sending copies of this report to the Secretary of Defense and the Under Secretary of Defense (Personnel and Readiness) and the Commissioners of the Election Assistance Commission. We will also make copies available to others upon request. In addition, the report will be available at no charge on the GAO Web site at <http://www.gao.gov>.

Should you or your staff have any questions about this report, please contact me at (202) 512-5559. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix V.



Derek Stewart
Director, Defense Capabilities and Management

Appendix I: Scope and Methodology

To assess DOD's electronic initiatives, we reviewed and analyzed relevant laws, directives, and guidance. These included DOD Directive 1000.4, Federal Voting Assistance Program (FVAP), updated April 14, 2004; and *DOD's Interim Department of Defense (DOD) Certification and Accreditation (C&A) Process Guidance*, dated July 6, 2006. We also reviewed applicable requirements documents for DOD's electronic efforts, as well as relevant reports by GAO, DOD, FVAP, the DOD Inspector General, and others, including *A Security Analysis of the Secure Electronic Registration and Voting Experiment (SERVE)*, dated January 21, 2004. In addition, we reviewed FVAP's 2006-2007 Voting Assistance Guide and its Web site to ascertain what type of information on electronic voting alternatives is provided to UOCAVA citizens.

We interviewed key program officials at the Office of the Under Secretary of Defense for Personnel and Readiness's Federal Voting Assistance Program (FVAP), the Business Transformation Agency, the Defense Manpower Data Center, and Voting Action Officers from several service headquarters. We also contacted officials from (1) election organizations, including the National Association of Secretaries of State and Joint Election Officials Liaison Committee and (2) organizations representing UOCAVA voters, including those from the National Defense Committee and the Overseas Vote Foundation. We made contact with officials from 14 of the 16 state and local election offices we called to obtain their perspectives on DOD's initiatives. Specifically, we included all 11 states that had participated in DOD's 2006 Integrated Voting Alternative Site—some of which participated in SERVE and other DOD programs and initiatives. We also included three other states that had 10 or more military bases and had participated in SERVE though not in IVAS. Table 3 lists the states we contacted and the programs in which these states participated.

Table 3: State Offices Contacted and Programs Where the States Were Participants

	States contacted	SERVE participants^a	IVAS Tool 1 participants^a	IVAS Tool 2 participants^a
1	Arkansas	Yes	Yes	No
2	Florida	Yes	No	No
3	Hawaii	Yes	No	No
4	Illinois	No	Yes	No
5	Indiana	No	No	Yes
6	Kentucky	No	No	Yes
7	Mississippi	No	Yes	No
8	Montana	No	No	Yes
9	North Carolina	Yes	Yes	No
10	Puerto Rico	No	Yes	No
11	South Carolina	Yes	No	No
12	Vermont	No	Yes	No
13	Virgin Islands	No	Yes	No
14	Washington	Yes	Yes	No
Totals	14 states contacted	6 SERVE states contacted	8 IVAS Tool 1 states contacted	3 IVAS Tool 2 states contacted

Source: GAO analysis of DOD data.

^aWhile a number of jurisdictions were included under each of the DOD programs listed, we spoke to at least one election official from each state.

To determine the Commission’s efforts to develop Internet voting guidelines and DOD’s efforts to develop the secure, Internet-based, absentee voting demonstration project, we reviewed and analyzed relevant laws, Commission reports, and to the extent they existed, the Commission’s strategic plan and other documents to ascertain its plans and efforts to develop Internet voting guidelines for UOCAVA voters. We also reviewed and analyzed various DOD requirements documents, GAO reports, internal DOD reports, and other reports related to DOD’s prior Internet-based absentee voting initiatives—Voting Over the Internet and SERVE—to ascertain, among other things, challenges and benefits associated with Internet voting efforts. Additionally, we interviewed key program officials within FVAP, including the Director and Deputy Director of FVAP and the Project Manager for SERVE, who is currently retired, along with officials on DOD’s private sector Security Peer Review Group. We also spoke with officials on the Commission’s Technical Guidelines

Development Committee and with the National Institute of Standards and Technology.

To ascertain DOD's efforts to develop plans to expand the use of electronic voting technologies in the future, we reviewed and analyzed laws, guidance, and reports to determine DOD's current and future plans for the Internet-based absentee voting demonstration project. Additionally, we examined, to the extent they existed, DOD's strategic plan and other documentation to determine its current and future plans for the Internet-based absentee voting demonstration project. We also interviewed responsible officials within DOD about these plans—including the Principal Deputy Under Secretary of Defense for Personnel and Readiness and the Director and Deputy Director of FVAP.

We conducted our work from August 2006 through April 2007 in accordance with generally accepted government auditing standards.

Appendix II: Examples of the Inconsistent Voting Assistance Guidance on DOD's Web Site

During the course of our review, we compared and analyzed the voting assistance guidance provided on DOD's Federal Voting Assistance Program (FVAP) Web site that covered electronic alternatives to mail. The online links we reviewed included FVAP's: (1) 2006-2007 Voting Assistance Guide (VAG)—a PDF version;¹ (2) 2006-2007 VAG—an HTML version;² (3) the archived 2006-2007 VAG—a PDF version dated October 25, 2005;³ (4) changes to the archived 2006-2007 VAG—called Errata Sheets; (5) News Releases; and (6) the 2006 Integrated Voting Alternative Site (IVAS). While not widespread, for 14 of the 55 states and territories, we found differences in some of the guidance provided on these links.⁴ Table 4 shows the differences we identified.

Table 4: Inconsistencies Identified in Guidance on Electronic Alternatives to Mail

State	Differences identified	Questions	FVAP response	GAO observation
1 California	Both PDF versions and the HTML Voting Assistance Guides state that only overseas military and overseas citizens may receive and send the ballot by fax. IVAS instruction does not restrict who can receive or send the ballot by fax.	Could an absentee ballot sent by fax by military personnel within the United States be rejected if a voter covered under the Uniformed and Overseas Citizens Absentee Voting Act relied solely on IVAS for voting guidance?	IVAS page was incorrect and was updated on 1/25/07. The instruction should have specified that Uniformed Servicemembers must be overseas to receive and send the ballot by fax. By law, an absentee ballot faxed from within the United States should be rejected.	Correction to IVAS has been verified.

¹PDF means Portable Document Format; it is a file format that is used to view electronic copies of paper documents, which allows an exact copy of the paper document.

²HTML means Hypertext Markup Language and is used to structure and format documents to be displayed on the World Wide Web.

³This 2006-2007 VAG was accessed at <http://www.fvap.gov/pubs/vag/pdfvag/2006-07vag.pdf>; but DOD deleted this link in February 2007.

⁴We found 16 instances in total. Two of the states had two separate discrepancies identified.

**Appendix II: Examples of the Inconsistent
Voting Assistance Guidance on DOD's Web
Site**

State	Differences identified	Questions	FVAP response	GAO observation
2 Colorado	<p>The News Release for Colorado on October 18, 2006, and IVAS “allow Uniformed Servicemembers deployed outside the U.S. to request, receive, and return absentee ballots via e-mail.”</p> <p>This is not reflected in the two PDF versions or HTML Voting Assistance Guides, nor was an errata sheet created.</p>	<p>Would overseas uniformed voters know of the e-mail options if they relied on the Voting Assistance Guide for voting guidance?</p>	<p>The Voting Assistance Guide, PDF, HTML, and errata sheet have been updated to reflect the change. Web site changes to the Voting Assistance Guide were made January 22, 2007.</p>	<p>Corrections to PDF, HTML, and errata sheet have been verified.</p> <p>FVAP stated that the “Publications” version of the Voting Assistance Guide in PDF format was the original book version of the Guide in electronic form. Since it was considered an archived document, FVAP officials stated that it was not intended for update; but, acknowledged that this version could have been marked better as an archived document. These officials have since deleted this version of the Guide from their Web site.</p>
3 Illinois	<p>FVAP issued an errata sheet for Illinois on September 29, 2006, and all changes except one are reflected in the HTML and PDF “Publications” versions of the Voting Assistance Guide and IVAS did not mention the change.</p> <p>Specifically, the change that is not captured is in Item IIE (Uniformed Services):</p> <p>“The Publications” PDF and HTML Voting Assistance Guides say Illinois does not allow receipt of blank ballots by fax or e-mail and IVAS does not address this issue.</p>	<p>Would uniformed voters be aware of the fax and e-mail provisions if they relied on IVAS, HTML Voting Assistance Guide, or “publications” PDF version?</p>	<p>The fax and e-mail provisions on the errata sheet and the Voting Assistance Guide PDF are correct as accepted by the State of Illinois. The IVAS page and the Voting Assistance Guide HTML were missing the information about the City of Chicago and Suburban Cook County allowing receipt of the blank ballot by fax or e-mail. The information was added on both the IVAS and the HTML on January 26, 2007.</p> <p>See note below on “Publications” version of the Voting Assistance Guide.^a</p>	<p>Corrections to IVAS and HTML have been verified.</p> <p>FVAP officials acknowledged that the “Publications” version of the Voting Assistance Guide could have been marked better as an archived document, and have since deleted this version of the Guide from their Web site.</p>

**Appendix II: Examples of the Inconsistent
Voting Assistance Guidance on DOD's Web
Site**

State	Differences identified	Questions	FVAP response	GAO observation
4 North Carolina	<p>FVAP issued a News Release and updated IVAS on October 20, 2006, stating that North Carolina now allows all citizens covered under the Uniformed and Overseas Citizens Absentee Voting Act to, among other things, receive blank absentee ballots and return voted ballots by fax. It also stated that the Federal Post Card Application could be faxed or e-mailed.</p> <p>This information was not reflected in the FVAP PDFs or HTML versions of the Voting Assistance Guide, nor was an errata sheet created.</p>	<p>Would voters covered under the Uniformed and Overseas Citizens Absentee Voting Act know of the fax or e-mail options if they relied on the Voting Assistance Guide publications?</p>	<p>Voting Assistance Guide pages updated to reflect information contained in News Release on January 29, 2007.</p> <p>See note below on "Publications" version of the Voting Assistance Guide.^a</p>	<p>Corrections to PDF and HTML Voting Assistance Guide and errata sheet have been verified.</p> <p>FVAP officials acknowledged that "Publications" version of the Voting Assistance Guide could have been marked better as an archived document, and have since deleted this version of the Guide from their Web site.</p>
5 Rhode Island	<p>Rhode Island's Overseas Civilians instructions for FVAP's PDFs and HTML Voting Assistance Guide include language in Section IIIB stating that ballots "may be requested by using the Federal Post Card Application, letter, telephone, fax, or e-mail."</p> <p>This language contradicts guidance in Section IIIE of the HTML and PDF Voting Assistance Guides which only mentions fax transmissions.</p> <p>Furthermore, the IVAS Web site says no e-mail is permitted.</p>	<p>Would overseas civilians know of the option to request the blank ballot by e-mail if they relied on Section IIIE of the Voting Assistance Guide or IVAS?</p>	<p>The language in question does not refer to the ability of the voter to request an absentee ballot via e-mail, but to request that a copy of a state form (now discarded) be sent to them, which could be requested by using a Federal Post Card Application, via fax, e-mail, phone, etc. Given that the state form has been discarded, the Voting Assistance Guide has been updated to reflect the change. Web site changes to the Voting Assistance Guide were made January 29, 2007.</p>	<p>Corrections to the PDF, HTML, IVAS, and errata sheet have been verified.</p>

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Voting Assistance Guidance on DOD's Web
Site**

State	Differences identified	Questions	FVAP response	GAO observation
6 South Dakota	<p>South Dakota's errata sheet from June 19, 2006 and the PDF Voting Assistance Guide require the Federal Post Card Application be notarized for stateside military voters.</p> <p>This is not mentioned as a requirement in IVAS, or the HTML or "Publications" Voting Assistance Guide. (Specifically, these say that "no registration or voting materials are notarized or witnessed.")</p>	<p>Would stateside military voters know that they are required to have the Federal Post Card Application notarized if they rely on IVAS, HTML or "Publications" Voting Assistance Guides instead of the errata sheet?</p>	<p>The change was made by South Dakota and approval signed. The PDF and errata sheet were changed, the HTML was overlooked, and correction was made January 26, 2007. The IVAS page did not contain full instructions but referred the reader to the Voting Assistance Guide instructions.</p> <p>See note below on "Publications" version of the Voting Assistance Guide.^a</p>	<p>Correction to the HTML has been verified.</p> <p>IVAS referred the voter to the Voting Assistance Guide instructions.</p> <p>FVAP officials acknowledged that "Publications" version of the Voting Assistance Guide could have been marked better as an archived document, and have since deleted this version of the Guide from their Web site.</p>
7 South Dakota	<p>South Dakota's errata sheet from October 4, 2006, and HTML and PDF Voting Assistance Guides allow voters covered under the Uniformed and Overseas Citizens Absentee Voting Act to send the Federal Post Card Application by fax and allow a voter to submit a scanned application as an e-mail attachment.</p> <p>This is not reflected in the "Publications" Voting Assistance Guide.</p>	<p>Would voters covered under the Uniformed and Overseas Citizens Absentee Voting Act know of the option to send the Federal Post Card Application by fax or via e-mail attachment if they relied on the "Publications" Voting Assistance Guide?</p>	<p>See note below on "Publications" version of the Voting Assistance Guide.^a</p>	<p>FVAP officials acknowledged that "Publications" version of the Voting Assistance Guide could have been marked better as an archived document, and have since deleted this version of the Guide from their Web site.</p>
8 Utah	<p>Utah's errata sheet from May 11, 2006, and PDF Voting Assistance Guide (uniformed services) states that registration and voting materials are not notarized or witnessed.</p> <p>This is not reflected in the HTML or PDF "Publications" version of the Voting Assistance Guide.</p> <p>For example, the HTML Voting Assistance Guide says that no notary or witness is required, but mentions certification.</p>	<p>Would uniformed voters know that they were not required to have their voting materials notarized if they relied on the HTML or "Publications" Voting Assistance Guide?</p>	<p>Change was made to reflect Utah's election law and approval signed. The PDF and errata sheet were corrected, however, the HTML was overlooked. Correction was made January 26, 2007. See note below on "Publications" version of the Voting Assistance Guide.^a</p>	<p>Correction to the HTML has been verified.</p> <p>FVAP officials acknowledged that "Publications" version of the Voting Assistance Guide could have been marked better as an archived document, and have since deleted this version of the Guide from their Web site.</p>

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Site**

State	Differences identified	Questions	FVAP response	GAO observation
9 Vermont	<p>While the notary section of Civilian Outside U.S. in the PDF Voting Assistance Guide has the statement about witness requirements for the return ballot, it does not have the statement: "However, your signature must be on the inside envelope certificate."</p> <p>This line is reflected in the HTML Voting Assistance Guide and in all notary sections of the Uniformed Services Voting Assistance Guides.</p>	Would overseas civilians know that their signature is required on the inside envelope certificate if they relied on the PDF Voting Assistance Guide?	The PDF Voting Assistance Guide had the signed approval of Vermont. The missing line was simply overlooked by the state and FVAP and was updated on January 25, 2007.	Correction to the PDF has been verified.
10 Alaska	<p>The HTML, "State-by-State" PDF Voting Assistance Guide, and IVAS instruction allow e-mailing of the blank ballot and voted ballot.</p> <p>This is not reflected in the "Publications" version of the PDF Voting Assistance Guide for Alaska.</p>	Would voters covered under the Uniformed and Overseas Citizens Absentee Voting Act know of the option to e-mail the blank and voted ballot if they relied on the "Publications" Voting Assistance Guide?	See note below on "Publications" version of the Voting Assistance Guide. ^a	FVAP officials acknowledged that "Publications" version of the Voting Assistance Guide could have been marked better as an archived document, and have since deleted this version of the Guide from their Web site.
11 Oregon	<p>An errata sheet on August 22, 2006 for Oregon and the HTML and PDF Voting Assistance Guides added, in addition to faxing, the words "or e-mail" to the electronic transmission sections in the Voting Assistance Guide.</p> <p>This information is not reflected in the "Publications" version of the Voting Assistance Guide.</p>	Would voters covered under the Uniformed and Overseas Citizens Absentee Voting Act know of the option to use e-mail for their voting materials if they relied on the "Publications" Voting Assistance Guide?	See note below on "Publications" version of the Voting Assistance Guide. ^a	FVAP officials acknowledged that "Publications" version of the Voting Assistance Guide could have been marked better as an archived document, and have since deleted this version of the Guide from their Web site.
12 South Carolina	<p>An errata sheet and a news release on May 5, 2006 and the HTML and PDF Voting Assistance Guides announced that voters are allowed to receive and return the ballot by fax or e-mail under any conditions or circumstances.</p> <p>This information is not reflected in the "Publications" version of the Voting Assistance Guide, which only allows fax and e-mail for emergencies.</p>	Would voters covered under the Uniformed and Overseas Citizens Absentee Voting Act know of the fax and e-mail options if they relied on the "Publications" Voting Assistance Guide?	See note below on "Publications" version of the Voting Assistance Guide. ^a	FVAP officials acknowledged that "Publications" version of the Voting Assistance Guide could have been marked better as an archived document, and have since deleted this version of the Guide from their Web site.

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Site**

State	Differences identified	Questions	FVAP response	GAO observation
13 Texas	<p>FVAP issued an errata sheet for Texas on July 24, 2006, that changed the first bullet in both electronic transmission sections, which says Texas allows voters to send the Federal Post Card Application by fax; but adds "to request an absentee ballot and for temporary registration only."</p> <p>This information was in the HTML and PDF Voting Assistance Guides but is not reflected in the "Publications" version of the Voting Assistance Guide.</p>	<p>Would voters covered under the Uniformed and Overseas Citizens Absentee Voting Act know the fax option was for only to request the ballot and temporary registration, if they relied on the "Publications" Voting Assistance Guide?</p>	<p>See note below on "Publications" version of the Voting Assistance Guide.^a</p> <p>The state of Texas only allows faxing to be used to request a ballot and for temporary registration. It is not allowed for the use of permanent registration. The impact on voters may be negligible as these voters still receive ballots for two successive election cycles.</p>	<p>FVAP officials acknowledged that "Publications" version of the Voting Assistance Guide could have been marked better as an archived document, and have since deleted this version of the Guide from their Web site.</p>
14 Virginia	<p>An errata sheet for Virginia on July 20, 2006, and the HTML and PDF Voting Assistance Guides allow only overseas military members to receive the blank ballot by e-mail or fax upon request.</p> <p>This information is not reflected in the "Publications" version of the Voting Assistance Guide.</p>	<p>Would stateside military members know of the stipulation that only overseas military members may receive the blank ballot by e-mail or fax if they relied on the "Publications" Voting Assistance Guide?</p>	<p>See note below on "Publications" version of the Voting Assistance Guide.^a</p>	<p>FVAP officials acknowledged that "Publications" version of the Voting Assistance Guide could have been marked better as an archived document, and have since deleted this version of the Guide from their Web site.</p>
15 Virginia	<p>An errata sheet for Virginia on July 20, 2006, and the HTML and PDF Voting Assistance Guides changed the Civilian language to "Some Virginia counties and cities allow you to receive the blank ballot by e-mail or fax upon request."</p> <p>This limiting information "some" is not reflected in the "Publications" version of the Voting Assistance Guide. It simply says that Virginia "allows you to receive the blank ballot you e-mail or fax upon request."</p>	<p>Would overseas civilians know of the stipulation that only some Virginia counties and cities allow receipt of the blank ballot by fax or e-mail if they relied on the "Publications" Voting Assistance Guide?</p>	<p>See note below on "Publications" version of the Voting Assistance Guide.^a</p>	<p>FVAP officials acknowledged that "Publications" version of the Voting Assistance Guide could have been marked better as an archived document, and have since deleted this version of the Guide from their Web site.</p>

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Site**

State	Differences identified	Questions	FVAP response	GAO observation
16 Wisconsin	FVAP issued an errata sheet on July 24, 2006 for Wisconsin allowing voters to send the Federal Post Card Application for absentee ballot request by fax or e-mail. This information is not reflected in the "Publications" Voting Assistance Guide.	Would voters covered under the Uniformed and Overseas Citizens Absentee Voting Act know of the option to send the Federal Post Card Application by fax or e-mail if they relied on the "Publications" Voting Assistance Guide instead of the errata sheet?	See note below on "Publications" version of the Voting Assistance Guide. ^a	FVAP officials acknowledged that "Publications" version of the Voting Assistance Guide could have been marked better as an archived document, and have since deleted this version of the Guide from their Web site.

Source: GAO analysis of DOD information.

^aFVAP stated that the "Publications" version of the Voting Assistance Guide in PDF format (<http://www.fvap.gov/pubs/vag/pdfvag/2006-07vag.pdf>) created on October 25, 2005, was the original book version of the Voting Assistance Guide in electronic format. Since it was considered an archived document it was not intended for update.

Appendix III: Comments from the Department of Defense



PERSONNEL AND
READINESS

UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, D. C. 20301-4000



Mr. Derek B. Stewart
Director, Defense Capabilities and Management
U.S. Government Accountability Office
441 G Street, N.W.
Washington, DC 20548

MAY 23 2007

Dear Mr. Stewart:

This is the Department of Defense (DoD) response to the GAO draft report, 'ELECTIONS: Action Plans Needed to Fully Address Challenges in Electronic Absentee Voting Initiatives for Military and Overseas Citizens,' dated May 9, 2007, (GAO Code 350900/GAO-07-774).

The Department concurs with the recommendations in the report. The Director of the Federal Voting Assistance Program (FVAP) administers the federal provisions of the *Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA)* on behalf of the Secretary of Defense. Since 1990, the FVAP has had a proven record of success with electronic alternatives to the by-mail absentee voting process and it continues to coordinate with all major stakeholders in this process, including the state and local level election officials and the U.S. Election Assistance Commission. The Department welcomes input from the GAO and will continue to make improvements to the program in order to better assist citizens covered under the *UOCAVA*.

Thank you for your recommendations and the opportunity to comment on this report.

Sincerely,

David S. C. Chu

Attachment:

1. Comments to the Recommendations



GAO DRAFT REPORT – DATED MAY 9, 2007
GAO CODE 350900/GAO-07-774

“ELECTIONS: Action Plans Needed to Fully Address Challenges in
Electronic Absentee Voting Initiatives for Military and Overseas Citizens”

DEPARTMENT OF DEFENSE COMMENTS
TO THE RECOMMENDATIONS

RECOMMENDATION 1: The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to comply with the information security requirements in the DoD Certification and Accreditation Process guidance.

DOD RESPONSE: Concur. The Department of Defense will contract for services to comply with the Federal Information Systems Management Act (FISMA) for the Electronic Transmission Service (ETS) through the DoD Information Assurance Certification and Accreditation Process (DIACAP). An extensive set of management, operational and technical controls is currently in place to manage the possible risk to voters and the DoD has begun the process to obtain the necessary certification and accreditation of these controls.

RECOMMENDATION 2: The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to incorporate lessons learned into plans for future systems such as those we identified including adding cautionary statements to future ballot request and receipt systems to warn Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) voters to remove personal data from their computers.

DOD RESPONSE: Concur. The Department of Defense will incorporate lessons learned for future registration, ballot request and receipt systems, including warnings to remove personal data from computers to guard against voters' personal information being compromised.

RECOMMENDATION 3: The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to institutionalize a process to review online Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) guidance to ensure that DoD provides accurate and consistent information to UOCAVA voters.

DOD RESPONSE: Concur. The Federal Voting Assistance Program (FVAP) has already streamlined its online information considerably by eliminating an archived 'Publications' version of the Voting Assistance Guide (VAG) entirely, and by deciding to post only a 'PDF' version of the VAG's State by State instructions for the 2007-2008 VAG. Additionally, the FVAP will also establish a revised review process for online information. These changes will reduce the possibility of human error and simplify the review and verification process of online information.

RECOMMENDATION 4: The GAO recommends that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness to create an integrated, comprehensive, long-term, results-oriented plan for future electronic voting programs that specifies, among other

things, the goals to be achieved along with tasks, milestones, time frames, and contingencies, and synchronizes them with planned development of the Commission's guidelines for Internet voting and safeguards for the security and privacy of all DoD's voting systems – both electronic and Internet. The plan should be developed in conjunction with major stakeholders – including state and local election officials, the Election Assistance Commission, overseas voting groups, and each of the armed services. The plan should also include initiatives that will be done well in advance of Federal elections, to allow adequate time for training and dissemination of information on the options available to Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) voters.

DOD RESPONSE: Concur. The DoD developed and implemented comprehensive plans for Voting Over the Internet and Secure Electronic Registration and Voting Experiment. It is in full support of a long-term, comprehensive plan for future electronic voting projects that would allow for sufficient time to involve the major stakeholders, train and disseminate information and ultimately serve UOCAVA voters. We look forward to working on this multi-year project plan in cooperation with the Election Assistance Commission (EAC), the National Institute of Standards and Technology (NIST) and other major stakeholders. A joint Federal Voting Assistance Program-EAC-NIST meeting is being scheduled to lay the groundwork for “an integrated, comprehensive, long-term, results-oriented plan for future electronic voting programs.” We look forward to working with the EAC as they take the lead on the recommended ‘action plan’ and as we develop our long-term plan in conjunction with them.

Appendix IV: Comments from the Election Assistance Commission



U. S. ELECTION ASSISTANCE COMMISSION
OFFICE OF THE EXECUTIVE DIRECTOR
1225 New York Avenue, NW, Suite 1100
Washington, DC. 20005

May 25, 2007

Mr. Derek B. Stewart
Director, Defense Capabilities
And Management
Government Accountability Office
Washington, DC 20548

RE: Comments regarding proposed GAO-07-774 Report:

Mr. Stewart:

Thank you for the opportunity to comment on the GAO report entitled: *ELECTIONS: Action Plans Needed to Fully Address Challenges in Electronic Absentee Voting Initiatives for Military and Overseas Citizens (GAO-07-774)* submitted to the Election Assistance Commission (EAC) on May 10, 2007. The EAC appreciates GAO's accuracy in its portrayal of the EAC and its current activities regarding military and overseas voters. The EAC is grateful to GAO for its recognition of the EAC's current research efforts to engage election officials and UOCAVA voters prior to the development of these guidelines for military and overseas voters. The EAC also accepts the recommendations as outlined in the report and has begun efforts to achieve the goals as provided to us in the recommendation.

As noted in your report, for the EAC's 2007 research on military and overseas voters, the EAC is conducting the largest survey of UOCAVA voters ever conducted. This survey of ten thousand UOCAVA voters is designed to explore the challenges faced by those voters and determine what solutions have been effective in meeting their unique needs as overseas voters. At last update the EAC had received five thousand replies to the survey and is anticipating more before the data is compiled. As surveys go, this is an excellent response at this point in the process. Based on the replies already received, the EAC is extremely optimistic that the survey results will provide an invaluable look into the UOCAVA experience, and guidance leading to the development of guidelines that are realistic and effective. Also as part of this study, the EAC is conducting case studies of four states that are using new techniques in technology to meet the needs of their UOCAVA voters. The EAC has scheduled a conference to discuss the research results in September of 2007. The EAC will invite election officials, FVAP, NIST, the Overseas Vote Foundation, and other stakeholders to discuss the results of the research and possible solutions to the problems UOCAVA voters face. Also at the conference, the EAC will be conferring with officials from the four states that are participating in the EAC's case studies in order to further explore the unique ways that these states are meeting the demands of their military and overseas voters, and thus help shape the agenda for future guidelines development.

Appendix IV: Comments from the Election Assistance Commission

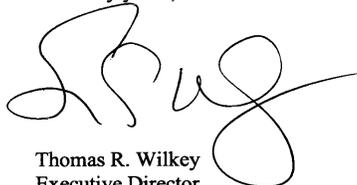
In response to one of the recommendations presented in the report, the EAC would like to note its constant and continued use of election officials in its projects. Besides the election officials who are appointed to the three statutory boards who are regularly updated on EAC projects, the EAC constantly updates election officials throughout the country on research and ongoing projects in order to ensure the work is accurate and useful. The EAC recognizes how important input from these officials is and will continue to work with them, especially those who use creative or new solutions to serve UOCAVA voters.

The EAC would like to reiterate its long held belief that National Institute of Standards and Technology (NIST), because of its internationally recognized technical expertise in developing standards, is essential to the development of voting guidelines for UOCAVA voters. NIST has in the past played a critical role in the development of voting system guidelines. With NIST's guidance the EAC released the newest version of the Voluntary Voting System Guidelines (VVSG) in 2005. Currently NIST is working with the EAC's Technical Guidelines Development Committee to create the next iteration of the VVSG which is a total re-write of VVSG 2005. NIST has consulted FVAP on a several occasions in the past to assist them in regard to UOCAVA voting and the use of the internet.

The EAC has met with FVAP and NIST and reached an agreement to work over the next several months to develop a timeline for the creation of UOCAVA guidelines. We all agree that the release of the EAC's UOCAVA study in September 2007 will be an important first step in this process as it will provide valuable information to help inform the guideline development process. Prior to the release of our study, the EAC, FVAP, and NIST will continue to meet in order to create a reasonable timeline for the creation of the guidelines pursuant to your recommendations.

Again, the EAC would like to thank GAO for the careful analysis of our work in this report and the recommendations to us. The Commission views this issue very seriously and GAO's guidance on this matter is greatly appreciated. We look forward to continued work with FVAP and NIST on this matter and eventually the successful creation of realistic and effective UOCAVA absentee ballot guidelines. Should you have any further questions, please feel free to contact me at (202) 566-3109 or twilkey@eac.gov.

Sincerely yours,



Thomas R. Wilkey
Executive Director

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Derek B. Stewart, (202) 512- 5559 or stewartd@gao.gov

Acknowledgments

In addition to the individual named above, David E. Moser, Assistant Director; Marion A. Gatling; Pawnee A. Davis; Amber M. Lopez; Joanne Landesman; Paula A. Moore; John K. Needham, John J. Smale; and Julia C. Matta made key contributions to this report.

Related GAO Products

Elections: All Levels of Government Are Needed to Address Electronic Voting System Challenges. [GAO-07-576T](#). Washington, D.C.: March 7, 2007.

Elections: DOD Expands Voting Assistance to Military Absentee Voters, but Challenges Remain. [GAO-06-1134T](#). Washington, D.C.: September 28, 2006.

Elections: The Nation's Evolving Election System as Reflected in the November 2004 General Election. [GAO-06-450](#). Washington, D.C.: June 6, 2006.

Election Reform: Nine States' Experiences Implementing Federal Requirements for Computerized Statewide Voter Registration Lists. [GAO-06-247](#). Washington, D.C.: February 7, 2006.

Elections: Views of Selected Local Election Officials on Managing Voter Registration and Ensuring Eligible Citizens Can Vote. [GAO-05-997](#). Washington, D.C.: September 27, 2005.

Elections: Federal Efforts to Improve Security and Reliability of Electronic Voting Systems Are Under Way, but Key Activities Need to Be Completed. [GAO-05-956](#). Washington, D.C.: September 21, 2005.

Elections: Additional Data Could Help State and Local Elections Officials Maintain Accurate Voter Registration Lists. [GAO-05-478](#). Washington, D.C.: June 10, 2005.

Department of Justice's Activities to Address Past Election-Related Voting Irregularities. [GAO-04-1041R](#). Washington, D.C.: September 14, 2004.

Elections: Electronic Voting Offers Opportunities and Presents Challenges. [GAO-04-975T](#). Washington, D.C.: July 20, 2004.

Elections: Voting Assistance to Military and Overseas Citizens Should Be Improved. [GAO-01-1026](#). Washington, D.C.: September 28, 2001.

Elections: The Scope of Congressional Authority in Election Administration. [GAO-01-470](#). Washington, D.C.: March 13, 2001.

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