REVISED

COMMONWEALTH of VIRGINIA
STATE BOARD OF ELECTIONS

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June 23, 2006

U.S. Election Assistance Commission
1225 New York Avenue, N.W., Suite 1100
Washington, DC 20005

Roger LaRouche:

Per your April 13, 2006 letter, I report that the Virginia State Board of Elections (SBE) has completed their Corrective Action Plan in response to the March 2006 Auditor of Public Accounts (APA) Audit. Our Corrective Action Plan and progress are summarized below.

1. **The SBE will update official policies and procedures documents describing and summarizing all relevant fiscal policies and procedures.**

COMPLETED

SBE staff reviewed existing policies and procedures related to HAVA expenditures. These documents included all relevant Federal regulations and circulars, the Virginia HAVA State Plan, and the "Using Excess HAVA Allocations: Application Procedures." Additionally, SBE staff performed a self-assessment with the EAC audit and assessment programs developed by the Office of Inspector General. SBE staff spoke with all relevant staff members, the APA auditor, and EAC staff to determine problems with old procedures and generate solutions. As a result, the Virginia HAVA State Plan is in the process of being amended and new fiscal procedures have been produced in the form of the "Locality HAVA Expenditures" guidelines. Specifically, the new guidelines: eliminate locality specific allocations in favor of a general need based grant system; include revised application forms that are easier to fill out with better defined steps to be taken; clearly define steps and roles of participants at each stage of the expenditure process; more thoroughly document personal services; and formalize federal asset inventory procedures.

2. **The SBE will update goals and measurements to evaluate successful implementation in fulfilling the state plan.**

200 North 9th Street, Suite 101 - Richmond 23219 - 804-864-8901 - Toll-Free (800) 552-9745 - Fax 804-371-0194 - TDD 800-260-3466
http://www.sbe.virginia.gov

COMPLETED

The 2006 Amendments to the Virginia HAVA State Plan require the Secretary of the SBE to draft specific goals and measures, submit them to the Board for approval, and post them to the SBE website. Many of these goals and measures were already collected for various other reports. These goals and measures included, in part: the implementation of VERIS, the replacement of punch card and lever voting machines, the completion of on-site accessibility audits for all polling places, the number of accessible polling places, the accuracy of voter registration records, the number of local county and city election officials that receive training, the rate of absentee ballots that are counted, and the rate of voter complaints.

The Secretary has drafted expanded goals and measures and presented them to the Board for approval. The Board unanimously approved these new goals and measurements.

3. **The SBE will provide training for all levels of management and staff involved with the administration of HAVA funds, as well as for localities, to facilitate compliance with the plan and federal requirements and regulations.**

COMPLETED

The training for SBE staff and localities consisted of the creation of new procedures documents and live training sessions. As indicated above, the procedures documents were created in a process that allowed for input from all stakeholders. The procedures document contains multiple examples with accompanying explanations.

Following the publication of the procedures documents, the SBE conducted three days of training sessions for SBE staff, registrars, and electoral board members. There were a total of six sessions, one for SBE staff and five for localities. Each training session for localities lasted approximately one hour and was delivered via conference call with an accompanying presentation that was posted to our secure website and brought up by participants before logging into the conference call. The training facilitator conducted each session simultaneously with everyone who dialed in to the conference call and then allowed for a question and answer period.

Including the localities who participated in the makeup session, 102 localities participated in the training with multiple representatives from some localities. Following the training sessions, the procedures document was revised to include more examples where localities were confused on earlier concepts.

4. **The SBE will submit amendments to the state plan that reflect current funding and spending plans to the federal Registrar by June 16, 2006 as required by HAVA Section 254.**

COMPLETED

REVISED

Following the audit, the SBE began the process of revising the Virginia HAVA State Plan. The proposed amendments were presented to the reconstituted HAVA State Plan Advisory Committee on May 17, 2006. Following the approval of the Advisory Committee, the SBE notified the public and published the proposed plan to the SBE website that evening. HAVA requires proposed amendments to be available for public comment for 30 days before they are submitted to the *Federal Register*. The State Board of Elections unanimously approved the proposed amendments on June 19, 2006 and they have been mailed to the EAC for publication in the *Federal Register*.

5. **The SBE will revise financial status reports and agree them to CARS.**

COMPLETED

The reconciliation of the financial status reports (SF-269) to Virginia's accounting system (CARS) was completed in April immediately following the final audit report. The revised reports are attached to this letter.

On behalf of the Commonwealth of Virginia, I thank the Commission for its assistance. I look forward to our continued collaboration to improve the administration of elections in Virginia.

Sincerely,

Jean R. Jensen
Secretary

Enclosures

REVISED

FINANCIAL STATUS REPORT (REVISED 2004 Report)
(*Long Form*)
(*Follow Instructions on previous pages and next page*)

1. Federal Agency and Organizational Element to Which Report is Submitted.	2. Federal Grant or Other Identifying Number Assigned By Federal Agency	OMB Approval No.	Page 1 of
Elections Assistance Commission	HAVA Title I, Section 101, cfda 39.011	0348-0039	1 Pages

3. Recipient Organization (*Name and complete address, including ZIP codes*
Virginia State Board Of Elections
200 North Ninth Street, Suite 101
Richmond, VA 23219-3485

4. Employer Identification Number	5. Recipient Account Number or Identifying Number	6. Final Report	7. Basis
[redacted]		Yes X No	X Cash Accrual

8. Funding Grant Period (*See instructions*) From: (Month, Day, Year)	To (Month, Day, Year)	9. Period Covered by This Report From: (Month, Day, Year)	To: (Month, Day, Year)
5/1/2003	Open	1/1/2004	12/31/2004

10. Transactions:	I Previously Reported	II This Period	III Cumulative
a. Total outlays	$86,522	$ 965,577	$1,052,099
b. Refunds, rebates, etc.	0	0	0.00
c. Program income used in accordance with the deduction alternative	0	0	0.00
d. Net outlays (Line a, less the sum of lines b and c)	$86,522	$965,577	$1,052,099
Recipient's share of net outlays, consisting of: e. Third party (in-kind) contributions	0	0	0.00
f. Other Federal awards authorized to be used to match this award	0	0	0.00
g. (1) Funds used in accordance with the **matching requirement**	0	0	0.00
(2) State funds used as **MOE**	0	0	0.00
(3) State funds used for both matching and MOE (-)	0	0	0.00
h. All other recipient outlays not shown on lines e, f, or g.	0	0	0.00
i. Total recipient share of net outlays (sum of lines e, f, g, and h)	0	0	0.00
j. Federal share of net outlays (line d less line i)	$86,522	$965,577	$1,052,099
k. Total unliquidated obligations	0	0	0.00
l. Recipient's share of unliquidated obligations	0	0	0.00
m. Federal share of unliquidated obligations	0	0	0.00
n. Total Federal share (sum of lines j and m)	$86,522	$965,577	$1,052,099
o. Total Federal funds authorized for this funding period	7,105,890	$7,019,368	7,105,890
p. Unobligated balance of Federal funds (Line o minus line n)	7,019,368	$6,053,791	$6,053,791
Program income consisting of: q. Disbursed program income shown on lines c and/or g above	0	0	0.00
r. Disbursed program income using the addition alternative	0	0	0.00
s. Undisbursed program income	0	0	0.00
t. Total program income realized (Sum of lines q, r, and s)	0	0	0.00

11. Indirect Expenses	a. Type of Rate (Place "X" in appropriate box) ___ Provisional ___ Predetermined ___ Final ___ Fixed			
	b. Rate	c. Base	d. Total Amount	e. Federal Share

12. Remarks: *Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation*

Interest earned on Title I Section 101 funds approximated $361,026 during calendar year 2004

12. Certification: **I certify to the best of my knowledge and belief that this report is correct and complete and that all outlays and unliquidated obligations are for the purposes are set forth in the award documents.**

Typed or Printed Name and Title	Telephone (area code, number and extension)
Reginald Wilson, Business Manager	(804) 864-8901
Signature of Authorized Certifying Official: Reginald C. Wilson	Date Report Submitted: 6/23/2006