

OFFICE OF INSPECTOR GENERAL

U.S. Election Assistance Commission

AUDIT OF THE ADMINISTRATION OF HELP AMERICA VOTE ACT GRANTS AWARDED TO THE STATE OF MONTANA

Report No. G25MT0057-26-01
December 9, 2025



HIGHLIGHTS

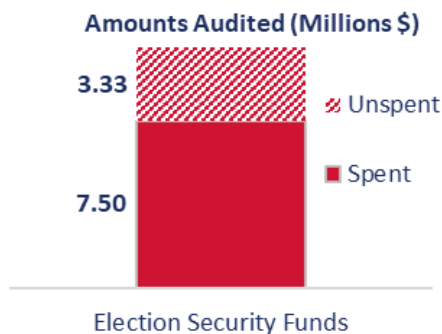
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What Was Audited

The independent public accounting firm of McBride, Lock & Associates, LLC, under contract with the Office of Inspector General, audited Help America Vote Act (HAVA) grants administered by the Montana Secretary of State, totaling \$10.83 million. This included federal funds, state matching funds, and interest income earned on the Election Security grant.



The **objectives** of the audit were to determine whether Montana:

- (1) used funds for authorized purposes in accordance with Section 101 of HAVA and other applicable requirements;
- (2) properly accounted for and controlled property purchased with HAVA payments; and
- (3) used funds in a manner consistent with the informational plans provided to the EAC.

What Was Found

The audit found that the Montana Secretary of State accounted for HAVA funds in accordance with applicable requirements, accounted for and controlled property purchased, and used the funds in a manner consistent with informational plans submitted during the audit period.

What Was Recommended

The audit did not identify any findings. Therefore, the report made no recommendations.



**U.S. ELECTION ASSISTANCE COMMISSION
OFFICE OF INSPECTOR GENERAL**

DATE: December 9, 2025

TO: U.S. Election Assistance Commission, Executive Director, Brianna Schletz

FROM: U.S. Election Assistance Commission, Inspector General, Sarah Dreyer

SUBJECT: Audit of the Administration of Help America Vote Act Grants Awarded to the State of Montana (Report No. G25MT0057-26-01)

This memorandum transmits the final report on Help America Vote Act grants awarded to the State of Montana. The Office of Inspector General contracted McBride, Lock & Associates, LLC, an independent certified public accounting firm, to conduct the audit. The contract required that the audit be performed in accordance with U.S. generally accepted government auditing standards.

McBride, Lock & Associates, LLC is responsible for the attached auditor's report dated September 2025, and the conclusions expressed therein. While the Office of Inspector General coordinated and monitored the firm's performance under the contract, we did not evaluate their adherence to standards and therefore do not express an opinion on the state's administration of grants.

The report does not contain any recommendations.

We appreciate the assistance you and your staff provided to us during this audit.

cc: Commissioner Donald L. Palmer, Chairman
Commissioner Thomas Hicks, Vice Chair
Commissioner Christy McCormick
Commissioner Benjamin W. Hovland

McBRIDE, LOCK & ASSOCIATES, LLC

Certified Public Accountants

Established 1980

Performance Audit Report

**Administration of Payments Received Under the Help America Vote Act by
the Montana Secretary of State**

Prepared for

**The United States Election Assistance Commission (EAC)
Office of Inspector General**

By

McBride, Lock & Associates, LLC

September 2025

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**Performance Audit Report
Administration of Payments Received Under the Help America Vote Act by
the Montana Secretary of State**

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**U.S. Election Assistance Commission
Performance Audit Report
Administration of Payments Received Under the Help America Vote Act by
the Montana Secretary of State**

EXECUTIVE SUMMARY

McBride, Lock & Associates, LLC was engaged by the United States Election Assistance Commission (EAC) Office of the Inspector General to conduct a performance audit of the administration of payments received under the Help America Vote Act (HAVA or the Act) by the Montana Secretary of State (Office). The payments received by the Office are identified as Election Security. The scope of the audit was Election Security administration from inception on May 21, 2018 through September 30, 2024. The objective of the audit was to determine whether the Office used payments authorized by Section 101 of the Help America Vote Act of 2002 (the HAVA) in accordance with HAVA and applicable requirements; properly accounted for and controlled the funds and property purchased with HAVA payments; used the funds in a manner consistent with the budget plan provided to EAC.

In addition, the Commission requires states to comply with certain financial management requirements, specifically:

- Expend payments in accordance with Federal cost principles established by the Office of Management and Budget (OMB) – (2 CFR 200).
- Submit detailed annual financial reports on the use of Title I payments.
- Maintain documents and records subject to audit to determine whether payments were used in compliance with HAVA.

We conducted this performance audit in accordance with *Generally Accepted Government Auditing Standards*. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on the audit objectives.

Based on the audit procedures performed we concluded that the Office accounted for and expended the Grant funds in accordance with the requirements mentioned above and for the periods mentioned above.

We have included in this report as Appendix A the Montana Secretary of State's written response to the draft report. Such response has not been subjected to audit procedures and, accordingly, we do not provide any form of assurance on the appropriateness of the response or the effectiveness of the corrective actions described therein.

BACKGROUND

The Help America Vote Act of 2002 (HAVA) created the U.S. Election Assistance Commission (Commission) to assist States and insular areas (hereinafter referred to as States) with improving the administration of federal elections and to provide funds to States to help implement these improvements. The Commission administers grants to States authorized by HAVA under Title I, as follows:

- Title I, Section 101 payments are for activities such as complying with Title III of HAVA for uniform and nondiscriminatory election technology and administration requirements; improving the administration of elections for Federal office; educating voters; training election officials and poll workers; developing a state plan for requirements payments; improving, acquiring, leasing, modifying, or replacing voting systems, and methods for casting and counting votes; improving the accessibility and quantity of polling places; and establishing toll-free telephone hotlines that voters may use.

The HAVA Election Security grant also requires that states must:

- Maintain funds in a state election fund (as described in Section 104 (d) of HAVA).
- Expend payments in accordance with Federal cost principles established by the Office of Management and Budget (OMB) – (2 C.F.R. § 200).
- Submit detailed annual financial reports on the use of Title I payments. Reports must include a summary of expenditures aligned with budget categories in the grantee's plan, a list of equipment obtained with the funds, and a description of how the funded activities met the goals of the plan.
- Provide matching funds of the Federal funds within a period stipulated by the award to be documented on the annual SF-425 submission
- Maintain documents and records subject to audit to determine whether payments were used in compliance with HAVA.

The Awardee – The Montana Secretary of State

The HAVA funds were awarded to the Montana Secretary of State. The Secretary of State oversees the administration of statewide elections. The Elections and Voter Services Division assists Montana voters, candidates, and election officials. The Division interprets election laws and provides guidance to ensure uniformity across Montana elections.

Help America Vote Act State of Montana State Plans

The Montana Secretary of State's HAVA budget narrative was prepared by the Secretary of State.

Election Security 2018, 2020, 2022, 2023 and 2024

The objectives of the 2018 funds were replacement of the statewide voting equipment, funding a subgrant program for counties, enhancing IT security, and funding an elections and voter services staff position.

The objectives of the 2020 funds were further funding of the county subgrant program, performing a security risk assessment and recovering administrative and indirect costs associated with IT security and grant administration, and election administration.

The objectives of the 2022 and 2023 funds were further funding of the county subgrant program, enhancing software and election systems, and recovering administrative and indirect costs associated with IT security and grant administration.

The objectives of the 2024 funds were further funding of the county subgrant program, conducting testing of voting systems and equipment, paying IT security employees and recovering administrative and indirect costs associated with IT security and grant administration.

AUDIT OBJECTIVES

The objectives of our audit were to determine whether the Office:

1. Used funds for authorized purposes in accordance with Section 101 of HAVA and other applicable requirements;
2. Properly accounted for and controlled property purchased with HAVA payments; and
3. Used the funds in a manner consistent with the informational plans provided to EAC.

In addition to accounting for Grant payments, the Grant requires states to maintain records that are consistent with sound accounting principles that fully disclose the amount and disposition of the payments, that identify the project costs financed with the payments and other sources, and that will facilitate an effective audit. The Commission requires states receiving Grant funds to comply with certain financial management requirements, specifically:

- Expend payments in accordance with Federal cost principles established by the Office of Management and Budget (OMB) – (2 CFR 200).
- Submit detailed annual financial reports on the use of Title I payments.
- Maintain documents and records subject to audit to determine whether payments were used in compliance with HAVA.

SCOPE AND METHODOLOGY

We audited the Election Security grant funds received and disbursed by the Office from May 21, 2018 through September 30, 2024. These funds are related to the appropriation of \$380 million under the Consolidated Appropriations Act (CAA), 2018 (P.L. 115-151), \$425 million under the CAA, 2020 (P.L. 115-141), \$75 million under the CAA, 2022 (P.L. 117-103), \$75 million under the CAA, 2023 (P.L. 117-328) and \$55 million under the CAA, 2024 (P.L. 118-47). The scope of activity audited is shown in the following table:

<u>Description</u>	<u>Election Security</u>
Funds Received from EAC	\$ 9,133,535
State Matching Funds	1,249,935
Interest Income	<u>449,644</u>
Total Funds	\$ 10,833,114
Less Disbursements	<u>(7,499,610)</u>
Fund Balance	<u>\$ 3,333,504</u>

The Office's Election Security expenditures detailed by budget and program category are included as Appendix C.

In planning and performing our audit, we identified the following internal control components and underlying internal control principles as significant to the audit objective:

Objective	Component	Principle
1	Control Activities	Selects and develops control activities Selects and develops general controls over technology Deploys through policies and procedures
	Information and Communication	Uses Relevant Information Communicates Internally Communicates Externally
2	Control Activities	Selects and develops control activities Selects and develops general controls over technology Deploys through policies and procedures
	Information and Communication	Communicates Externally
3	Control Activities	Selects and develops control activities Selects and develops general controls over technology Deploys through policies and procedures

We assessed the design, implementation, and operating effectiveness of these internal controls and identified deficiencies that we believe could affect the Office's ability to use funds for authorized purposes, and properly account for and control property. The internal control deficiencies we found are discussed in the Audit Results section of this report.

Additionally, for the components and principles which we determined to be significant, we assessed the internal controls and compliance with laws and regulations necessary to satisfy the audit objective.

However, because our review was limited to these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

We excluded procedures related to interest income from the audit due to the Office being included in a separate audit of interest income earned on HAVA funds dated April 15, 2024.

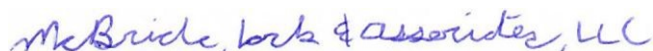
AUDIT RESULTS

We conducted this performance audit in accordance with *Generally Accepted Government Auditing Standards*. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on the audit objectives.

Based on the audit procedures performed, we concluded that the Office accounted for HAVA funds in accordance with the requirements mentioned above, accounted for and controlled property purchased, and used the funds in a manner consistent with informational plans submitted during the audit period.

The Office responded on October 6, 2025 and the EAC responded on November 20, 2025. The Office's complete response is included as Appendix A-1 and the EAC's complete response as Appendix A-2.

McBride, Lock & Associates, LLC performed the related audit procedures between January 15, 2025, and September 11, 2025.



McBride, Lock & Associates, LLC
Kansas City, Missouri
September 11, 2025

APPENDIX A-1

Response of the Montana Secretary of State to the Draft Report



MONTANA SECRETARY OF STATE'S OFFICE



October 6, 2025

U.S. Election Assistance Commission
Office of Inspector General
1335 East-West Highway, Suite 4300
Silver Spring, MD 20910

Dear U.S. Election Assistance Commission and Acting Inspector General, Sarah Dreyer:

The Montana Secretary of State's Office appreciates the opportunity to respond to the Audit of the Administration of Help America Vote Act (HAVA) Grants Awarded to the State of Montana.

We would like to extend our sincere gratitude to the audit team for their thorough and professional work. Their efforts have been instrumental in validating our processes to ensure financial accuracy, accountability, and compliance with the law.

We are proud to acknowledge that no findings were made, which underscores our commitment to election integrity, operational excellence, and fiscal responsibility. This positive outcome reflects the dedication and hard work of our team in ensuring that all grant funds are managed effectively and in compliance with federal law and all applicable regulations.

With the support of the HAVA grant, we accomplished significant milestones, including the launch of a new voter registration system and the enhancement of the security posture of the Secretary of State's office and all Montana counties in the administration of federal elections.

We remain committed to maintaining the highest standards of transparency and accountability in our operations.

Thank you for your continued support and partnership.

Sincerely,

A handwritten signature in blue ink that reads "Christi Jacobsen".

CHRISTI JACOBSEN
Secretary of State

APPENDIX A-2

Response of the U.S. Election Assistance Commission to the Draft Report



U.S. ELECTION ASSISTANCE COMMISSION
633 3rd St. NW, Suite 200
Washington, DC 20001

TO: Sarah Dreyer, Inspector General, U.S. Election Assistance Commission, Office of
Inspector General

FROM: Brianna Schletz
Executive Director

A handwritten signature in black ink, appearing to be "BS" with a flourish.

DATE: November 20, 2025

RE: Response to Draft Audit Report of Help America Vote Act Grants Awarded to the
State of Montana, Report No. G25MT0057-26-XX

Thank you for the opportunity to comment on the Draft Audit Report of Help America Vote Act Grants Awarded to the State of Montana. We are pleased to note there were no findings in the report. We appreciate the collaboration with the Montana Secretary of State's Election Division and the constructive approach taken during this engagement.

AUDIT SCOPE AND METHODOLOGY

Our audit methodology included:

- Assessing audit risk and significance within the context of the audit objectives.
- Obtaining an understanding of internal control that is significant to the administration of the HAVA funds and of relevant information systems controls as applicable.
- Identifying sources of evidence and the amount and type of evidence required.
- Determining whether other auditors have conducted, or are conducting, audits of the program that could be relevant to the audit objectives.

As part of our audit, we gained an overall understanding of the internal control environment at the Office. Based on this understanding, we identified certain internal controls that we considered to be significant (or key controls) to achieving each objective. All components of internal control are relevant, but not all may be significant. Significance is defined as the relative importance of a matter within the context in which it is being considered, and is a matter of professional judgment. We made the following determination as to the significance of the underlying internal control principles:

		Objective		
		1	2	3
Control Environment				
1	Demonstrates Commitment to integrity and ethical values	No	No	No
2	Exercises oversight responsibility	No	No	No
3	Establishes structure, authority, and responsibility	No	No	No
4	Demonstrates commitment to competence	No	No	No
5	Enforces accountability.	No	No	No
Risk Assessment				
6	Specifies suitable objectives	No	No	No
7	Identifies and analyzes risk	No	No	No
8	Assesses fraud risk	No	No	No
9	Identifies and analyzes significant change	No	No	No
Control Activities				
10	Selects and develops control activities	Yes	Yes	Yes
11	Selects and develops general controls over technology	Yes	Yes	Yes
12	Deploys through policies and procedures	Yes	Yes	Yes
Information and Communication				
13	Uses relevant information	Yes	No	No
14	Communicates internally	Yes	No	No
15	Communicates externally	Yes	Yes	No
Monitoring				
16	Conducts ongoing and/or separate evaluations	No	No	No
17	Evaluates and communicates deficiencies	No	No	No

The significance was determined as follows:

Objective 1: Control Activities and its underlying principles were deemed to be significant to our determination of the awardee's compliance with the objective. The Control Activities component includes the design and implementation of specific tasks performed by individuals within the entity to fulfill their duties and responsibilities and to respond to identified risks. These principles address the design and implementation of activities related to management review, segregation of duties (including restriction of access with the information system), and documentation of internal controls and transactions. We determined these principles to be the most significant to the Office's proper use of funds and compliance with award requirements.

Information and Communication and its underlying principles were deemed to be significant to our determination of the awardee's compliance with the FFR reporting portion of this objective. These principles address the quality of the information and the internal and external communication processes used to compile the data necessary to meet the Office's reporting objectives.

Objective 2: Control Activities and its underlying principles were deemed to be significant to our determination of the awardee's compliance with the objective. The Control Activities component includes the design and implementation of specific tasks performed by individuals within the entity to fulfill their duties and responsibilities and to respond to identified risks. These principles address the design and implementation of activities related to management review, segregation of duties (including restriction of access with the information system), and documentation of internal controls and transactions. We determined these principles to be the most significant to the state's proper accounting and control over equipment purchased with HAVA funds.

The Information and Communication principle of Communicate Externally was deemed to be significant to our determination of the awardee's compliance with the objective because the Office communicated with and relied on information from the counties where the equipment is located as part of the control system for accounting and controlling equipment purchased with HAVA funds.

Objective 3: Control Activities and its underlying principles were deemed to be significant to our determination of the awardee's compliance with the objective. The Control Activities component includes the design and implementation of specific tasks performed by individuals within the entity to fulfill their duties and responsibilities and to respond to identified risks. These principles address the design and implementation of activities related to management review, segregation of duties (including restriction of access with the information system), and documentation of internal controls and transactions. We determined these principles to be the most significant to the Office's use of funds in a manner consistent with the plans provided to EAC.

To implement our audit methodology, below are some of the audit procedures we performed.

- Interviewed appropriate Office employees about the organization and operations of the HAVA program.
- Reviewed prior single audit reports and other reviews related to the State's financial management systems and the HAVA program for the period under review.
- Reviewed policies, procedures and regulations for the Office management and accounting systems as they relate to the administration of the HAVA program.
- Tested major purchases and the supporting documentation.
- Tested randomly sampled payments made with HAVA funds.
- Evaluated compliance with the requirements for accumulating financial information reported to the Commission on the financial status reports and progress reports, accounting for property, purchasing HAVA related goods and services, and using funds in a manner consistent with the budget plan provided to EAC.
- Verified the establishment and maintenance of an election fund.
- Observed the physical security/safeguards of selected equipment purchased with HAVA funds and ensure compliance with federal regulation.
- Verified whether the matching requirement was met and, if so, that matching expenditures met the prescribed criteria and allowability requirements of HAVA.

**ELECTION SECURITY EXPENDITURES BY BUDGET CATEGORY AND PROGRAM CATEGORY
MAY 21, 2018 TO SEPTEMBER 30, 2024**

Budget Categories	Program Categories						Total
	Voting Equipment	Election Auditing	Voter Registration Systems	Cyber Security	Communications	Other - County Subgrant Program	
Personnel (Including Fringe)	\$ -	\$ -	\$ 199,266	\$ 100,000	\$ -	\$ 249,983	\$ 549,249
Equipment	2,530	-	-	-	-	-	2,530
Training	-	-	-	316	-	-	316
Contractual	-	-	2,601,558	-	78,150	-	2,679,708
Subgrants	654,151	-	-	-	-	1,723,701	2,377,852
Total Direct Costs	\$ 656,681	\$ -	\$ 2,800,824	\$ 100,316	\$ 78,150	\$ 1,973,684	\$ 5,609,655
Indirect Costs (if applied)	-	-	-	-	-	640,020	640,020
Total Federal Expenditures	\$ 656,681	\$ -	\$ 2,800,824	\$ 100,316	\$ 78,150	\$ 2,613,704	\$ 6,249,675
Non-Federal Match	-	-	1,249,935	-	-	-	1,249,935
Total Program Expenditures	<u>\$ 656,681</u>	<u>\$ -</u>	<u>\$ 4,050,759</u>	<u>\$ 100,316</u>	<u>\$ 78,150</u>	<u>\$ 2,613,704</u>	<u>\$ 7,499,610</u>

Appendix C (Cont'd)

County	Subgrant Spending by Program Categories						Total
	Voting Equipment	Election Auditing	Voter Registration Systems	Cyber Security	Communications	Other - County Subgrant Program	
Anaconda-Deer Lodge	\$ 7,059	\$ -	\$ -	\$ -	\$ -	\$ 34,753	\$ 41,812
Beaverhead	15,882	-	-	-	-	24,494	40,376
Big Horn	19,411	-	-	-	-	11,139	30,550
Blaine	10,589	-	-	-	-	40,696	51,285
Broadwater	7,059	-	-	-	-	25,740	32,799
Butte-Silver Bow	12,352	-	-	-	-	20,601	32,953
Carbon	14,117	-	-	-	-	15,521	29,638
Carter	7,058	-	-	-	-	15,000	22,058
Cascade	14,117	-	-	-	-	41,490	55,607
Chouteau	14,117	-	-	-	-	20,801	34,918
Custer	17,646	-	-	-	-	26,699	44,345
Daniels	7,058	-	-	-	-	4,852	11,910
Dawson	5,294	-	-	-	-	25,972	31,266
Fallon	3,529	-	-	-	-	7,070	10,599
Fergus	12,352	-	-	-	-	14,892	27,244
Flathead	44,115	-	-	-	-	118,099	162,214
Gallatin	22,940	-	-	-	-	186,859	209,799
Garfield	-	-	-	-	-	13,971	13,971
Glacier	12,352	-	-	-	-	43,195	55,547
Golden Valley	3,529	-	-	-	-	-	3,529

Appendix C (Cont'd)

County	Subgrant Spending by Program Categories						Total
	Voting Equipment	Election Auditing	Voter Registration Systems	Cyber Security	Communications	Other - County Subgrant Program	
Granite	\$ 7,058	\$ -	\$ -	\$ -	\$ -	\$ 18,411	\$ 25,469
Hill	14,117	-	-	-	-	31,506	45,623
Jefferson	12,352	-	-	-	-	41,691	54,043
Judith Basin	8,823	-	-	-	-	-	8,823
Lake	21,175	-	-	-	-	47,112	68,287
Lewis & Clark	33,528	-	-	-	-	80,660	114,188
Liberty	5,294	-	-	-	-	17,454	22,748
Lincoln	14,117	-	-	-	-	37,298	51,415
Madison	15,881	-	-	-	-	23,853	39,734
McCone	7,058	-	-	-	-	3,668	10,726
Meagher	3,529	-	-	-	-	10,564	14,093
Mineral	8,823	-	-	-	-	19,358	28,181
Missoula	51,174	-	-	-	-	126,158	177,332
Musselshell	7,058	-	-	-	-	-	7,058
Park	8,823	-	-	-	-	31,899	40,722
Petroleum	3,529	-	-	-	-	10,312	13,841
Phillips	3,529	-	-	-	-	19,692	23,221
Pondera	8,823	-	-	-	-	19,424	28,247
Powder River	10,588	-	-	-	-	16,733	27,321
Powell	15,881	-	-	-	-	28,623	44,504

Appendix C (Cont'd)

County	Subgrant Spending by Program Categories						Total
	Voting Equipment	Election Auditing	Voter Registration Systems	Cyber Security	Communications	Other - County Subgrant Program	
Prairie	\$ 5,294	\$ -	\$ -	\$ -	\$ -	\$ 25,841	\$ 31,135
Ravalli	14,117	-	-	-	-	73,728	87,845
Richland	12,352	-	-	-	-	-	12,352
Rossevelt	15,881	-	-	-	-	26,167	42,048
Rosebud	12,352	-	-	-	-	24,151	36,503
Sanders	14,117	-	-	-	-	26,959	41,076
Sheridan	7,058	-	-	-	-	18,457	25,515
Stillwater	15,881	-	-	-	-	20,096	35,977
Sweet Grass	3,529	-	-	-	-	26,094	29,623
Teton	10,588	-	-	-	-	-	10,588
Toole	8,823	-	-	-	-	18,881	27,704
Treasure	3,529	-	-	-	-	-	3,529
Valley	3,529	-	-	-	-	-	3,529
Wheatland	-	-	-	-	-	28,073	28,073
Wibaux	1,765	-	-	-	-	15,534	17,299
Yellowstone	13,600	-	-	-	-	143,460	157,060
Total Direct Costs	\$ 654,151	\$ -	\$ -	\$ -	\$ -	\$ 1,723,701	\$ 2,377,852
Indirect Costs (if applied)	-	-	-	-	-	-	-
Total Federal Expenditures	\$ 654,151	\$ -	\$ -	\$ -	\$ -	\$ 1,723,701	\$ 2,377,852

**MONETARY IMPACT AS OF SEPTEMBER 30, 2024 FOR ELECTION
SECURITY AND SECTION 101 REISSUED GRANTS**

Description	Questioned Costs	Unsupported Costs	Additional Funds for Program
Election Security Grant	\$ -	\$ -	\$ -
Total	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>



Visit our website at oig.eac.gov.

U.S. Election Assistance Commission
Office of Inspector General
633 3rd Street, NW, Second Floor
Washington, DC 20001

Report Waste, Fraud, and Abuse
eacoig@eac.gov | [Online Complaint Form](https://oig.eac.gov)