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Office of the Secretary of State**

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**November 20, 2025**

**To: Hon. Matthew Birong, Chair  
House Committee on Government Operations and Military Affairs  
Hon. Brian Collamore, Chair  
Senate Committee on Government Operations**

**From: S. Lauren Hibbert, Deputy Secretary of State  
Sean Sheehan, Director, Elections and Campaign Finance**

**Re: Multi-District Audit Report, as Directed by Act 70 of 2025**

Dear Committees,

Section 18 of Act 70 of 2025 called for an audit of voter checklists and legislative district boundaries. Specifically, the Act stated:

*On or before September 15, 2025, local boards of civil authority and town clerks whose municipal boundaries are divided for the purpose of Representative districts and Senatorial districts shall audit their voter checklists to ensure that those checklists accurately correspond to the prescribed district boundaries.*

The Act also called for each multi-district town clerk to provide a written summary of the audit to the Elections Division of the Secretary of State's office, for the Secretary to report the findings to the committees of jurisdiction, and for the Elections Division to provide support and training to the town clerks and boards of civil authority.

This report contains the following sections:

1. Executive Summary
2. Background: Vermont's Redistricting Process
3. Vermont's Ongoing and Biennial Checklist Updating Processes
4. 2025 Audit Process
5. District Audit Results
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## **Executive Summary**

Act 70 of 2025 required Vermont cities and towns with multiple legislative districts to conduct an audit of their voter checklists to ensure voters were assigned to the correct district. All 24 required municipalities complied with the requirement, with all but one doing so by the legislative deadline.

Overall, the audit found three categories of issues.

First, the audit found three towns had made minor errors in operationalizing the 2022 redistricting process. The largest number of errors was in Burlington, where 26 of the city's 29,158 voters had to be moved to another district. Williamstown and Colchester had to move one and five voters, respectively.

The Secretary of State's office recommends mitigation of future occurrences of this error by requiring a district audit to be conducted by clerks and boards of civil authority (BCA) immediately after future redistricting processes (with the next one presumably being in 2032).

Second, the audit found data integrity issues related to voter records carried forth from prior election systems. These issues resulted in voters being assigned to another district in town. Twelve towns had to collectively move 68 voters to another legislative district due to a legacy data issue, an average of just under six voters per impacted town.

Fortunately, the new Vermont Election Management System, launched in May, has safeguards to prevent data entry errors with new registrants. It has also enabled the Secretary of State's office to run control reports to identify issues with legacy data. This summer and fall, the office ran control reports and worked with clerks to correct relevant voter records. The office will continue to run reports to continue to improve data integrity.

Third, the audit found one voter who had moved to a new residence across town and needed to be moved to another district. This was not an error per se, but rather a normal activity that is regularly caught and updated as clerks and BCA review voter checklists in accordance with state law.

All of these discoveries were quickly corrected. Moreover, all three types of issues can be better prevented in the future through improved processes and systems, including new features of Vermont's new Election Management System launched in May. The Elections Division will continue to support clerks and BCA with reminders, instructions, and reporting on their biennial checklist review.

Together, through these measures, Vermonters can continue to work together to ensure that every voter votes in their proper district and that our elections are as free, fair, and accessible as possible.

## **Background: Vermont's Redistricting Process**

Vermont is required to reapportion House and Senate districts every ten years to reflect Vermont's changing population. Most recently, in April 2022, Act 89 reapportioned Vermont's legislative districts based on data from the 2020 U.S. Census. The new legislative map allowed over 90% of cities and towns to have a single representative district and a single senate district. In other words, every citizen in each of these 223 municipalities shares the same representative(s) and senator(s) as everyone else in town.

In the other 24 municipalities, district lines ran through the middle of town. The process of operationalizing district boundaries and updating voter records involved a partnership between state and local officials.

In Vermont, elections are run at the local level. This means that responsibility for a town's voter checklist ultimately lies with the town clerk and board of civil authority (BCA). These locally elected or appointed officials process applications to add voters to the voter registration checklist. They also review the checklist to remove voters who have died or moved out of town. They ensure the records of their voters are accurate, including when legislative districts change.

The Elections Division's role is to update the statewide computer system that municipal clerks use to manage their voter checklists. Once this update was complete, clerks could then assign the new districts to specific "street segments" in their town. For example, if a district line was just beyond 100 River Road, the clerk could assign a 1-100 River Road street segment as District 1. Then they could assign a 101 and above River Road street segment to District 2. Or, if the line between District 1 and District 2 ran down the middle of Main Street, the clerk could assign an even-numbered street segment to District 1 and an odd-numbered street segment to District 2. Once the clerk completed this task, the system would automatically assign voters living at those street addresses to the new districts.

In addition, the Elections Division and E-911 staff both assisted clerks and BCA as needed. Elections Division staff trained clerks on the system, answered system questions, and could log in to help them with the task of inputting the segments to the clerk's specifications. If clerks and BCA had questions about a residence relative to maps and district boundaries, they met with E-911 staff to seek clarification. The clerks then updated the system's street segments accordingly.

## **Vermont's Ongoing and Biennial Checklist Updating Processes**

Beyond the ten-year redistricting work, municipal clerks and BCA review and update voter checklists on an ongoing basis throughout the year and in a systematic way every two years. State statute lays out the process and timeline for the biennial review, requiring: "by September 15 of each odd-numbered year, the board of civil authority shall review the most recent checklist name by name and consider, for each person whose name appears on the checklist, whether that person is still qualified to vote." (17 V.S.A. § 2150)

Vermont statute also requires that any systematic program for removing names from the checklist shall be completed at least 90 days before an election. (17 V.S.A. § 2150(b))

The Elections Division supports clerks and BCA with reminders, instructions, and reporting on their biennial checklist review. As of this report, 235 municipalities had certified their review. An additional six

towns were waiting until the November 4<sup>th</sup> Central Vermont Career Center vote, having been unable to complete the review before the 90-day moratorium. These six towns committed to complete and certify their review of their checklist by the end of November. That would leave just six small towns, collectively with 7,250 voters (1.5% of statewide voters) outstanding on their 2025 voter checklist review. The Elections Division continues to communicate with these six towns as well, with the goal of reaching even greater compliance.

### **2025 Audit Process**

Once Act 70 of 2025 was enacted, the Elections Division identified the two dozen municipalities that contain more than one Representative and/or Senate district. The Elections Division contacted the relevant clerks and provided instructions, links, and resources for leading their boards of civil authority in conducting an audit.

This communication noted the deadline for completing the audit was September 15, 2025. It also pointed out that this was the same date as the deadline for the biennial checklist review. The Division suggested that clerks and BCA had the option of conducting their district audit as part of their biennial checklist review, thereby mitigating the burden of conducting a separate audit.

### **District Audit Results**

All 24 municipalities completed the district audit and reported the results to the Secretary of State's office. All but one did so by the October 1 deadline. Sunderland submitted its report on November 20.

All 24 municipal audits confirmed that the vast majority of voters were in the proper district. However, the audits revealed that most municipal checklists needed at least one voter to be moved to a different district. Eleven towns needed to correct legislative districts for one to five voter records. Five towns needed to correct between six and 26 voter records. Eight towns did not require any corrections.

Three of the 24 towns had street segment issues that required voters to be moved to another legislative district. In Burlington, the street segment corrections impacted 26 voters – or nearly one out of every 1,000 registered voters. Colchester's error impacted five voters, while Williamstown's placed a single voter in the town's other district. In all of these cases, the segment was corrected, and the clerk confirmed that the system moved the voters to their proper districts.

A second issue, impacting at least one voter in the 12 towns, was not related to the redistricting process per se. Rather, it had to do with data issues for voters who typically registered many years ago in prior systems. Formatting errors or a failure to provide complete address information records could lead to voters being assigned to an incorrect district. For example, a voter whose record listed their apartment number in the street address field rather than the apartment number field could lead to the voter being assigned to an odd or even street segment based on their apartment number rather than their street number.

Collectively, the 12 towns moved 68 voters to another legislative district due to this issue, an average of just under six voters per impacted town. Eight towns needed to correct between one and five voter records. Four towns needed to move between eight and 17 legacy data issues.

# of Voter Records Needing Legislative District Correction by Town			
# of Corrections Needed	0	1-5	6+
# of Municipalities, Street Segment Issue	21	2	1
# of Municipalities, Legacy Data Issue	12	8	4
# of Municipalities, Voter Moved	23	1	0

District Audit Summary		
Town	# of Voters Needing Legislative District Update or Correction	Notes
Bennington	5	Legacy data issue, corrected.
Brattleboro	0	No issues.
Burlington	26	Street segment adjustments. Audit also corrected eight voters' ward assignment.
Colchester	5	Street segment adjustment.
Essex Junction City	12	Legacy data issue, corrected.
Essex Town	3	Legacy data issue, corrected.
Georgia	2	Legacy data issue, corrected.
Hartford	0	No issues.
Hinesburg	5	Legacy data issue, corrected.
Middlebury	1	Legacy data issue, corrected.
Milton	17	Legacy data issue, corrected.
New Haven	1	Voter had moved across town, updated.
Pownal	1	Legacy data issue, corrected.
Rutland City	0	No issues.
Rutland Town	0	No issues.
Shelburne	3	Legacy data issue, corrected.
South Burlington	0	No issues.
Saint Albans City	9	Legacy data issue, corrected.
Saint Albans Town	8	Legacy data issue, corrected.
Stowe	2	Legacy data issue, corrected.
Sunderland	0	No issues.
Wells	0	No issues.
Williamstown	1	Street segment adjustment.
Williston	0	No issues.

## Opportunities for Improvement

Generally speaking, because Vermont elections are conducted at the local level, efforts to ensure checklist accuracy are a collaborative effort. The Elections Division can, and will, continue to support Vermont's 247 town clerks in ongoing voter checklist maintenance.

Vermont's state and local officials have steadily built and improved checklist maintenance processes in accordance with state and federal law. By leaving control and responsibility of voter rolls in the hands of local officials while centralizing and automating some aspects of voter registration and information access, these systems reduce the likelihood of human error and improve the efficiency of maintaining accurate voter lists. Clerks and BCAs are increasingly empowered to identify discrepancies and potential inaccuracies in voter rolls in a way that had never been possible before.

Looking at the results of the district audit, the Secretary of State's office identifies three additional opportunities for improvement.

First, our office recommends future district audits to mitigate the occurrence of the street segment error after the upcoming redistricting efforts. Presuming the next reapportionment occurs after the 2030 U.S. Census, a district audit should be conducted by clerks and immediately after the districts are operationalized, ahead of the 2032 elections. The Elections Division will also review its 2022 processes for engaging with clerks and E-911 staff to identify other opportunities for improvement. Our office will engage the Vermont Center for Geographic Information and other partners to assess the costs, benefits, and risks of converting voter addresses to geocodes and then assigning districts based on geocodes.<sup>1</sup>

Second, regarding legacy data issues, Vermont is fortunate to have a more robust system to improve data integrity. The new Vermont Election Management System, launched in May, has safeguards to prevent errors with new entries. It enables the Elections Division to run control reports to identify issues from legacy systems. This summer and fall, the office ran control reports and worked with clerks to correct relevant voter records. The office will continue to run reports and work with clerks to correct relevant voter records. This collective effort will improve data integrity.

Finally, Vermont will continue to lean on local review and transparency efforts. The Secretary of State's office will continue to support municipal clerks and BCA in reviewing and updating voter checklists on an ongoing basis throughout the year and in a systematic way every two years, per 17 V.S.A. § 2150. Furthermore, we continue to enlist the vigilance of voters themselves by promoting the requirement under 17 V.S.A § 2501(d) for the BCA to "post prominent notices in and around the polling places urging voters to check whether they have been placed on the proper geographical checklist. The notice shall also explain the procedures by which a voter who is on the wrong checklist for his or her geographical area can be added to the proper checklist and vote at the proper polling place."

Together, through these measures, Vermonters can continue to work to ensure that every voter votes in their proper district and that our elections are as free, fair, and accessible as possible.

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<sup>1</sup> A geocode is set of geographical coordinates – longitudinal and latitudinal - that correspond to a location. Geocoding allows for the integration of address-based data with other spatial datasets for greater precision.