



House Bill 1848

*Feasibility Study on
Central Counting Station
Operating as Sensitive Compartmented
Information Facility*



**Texas Secretary of State
Elections Division**

800 252 VOTE • 512 463 5650
sos.texas.gov • votetexas.gov

December 2024

TABLE OF CONTENTS

INTRODUCTION	III
SENSITIVE COMPARTMENTED INFORMATION FACILITY (SCIF)	1
Typical Elements of a SCIF	2
Temporary/Deployable SCIF.....	2
CENTRAL COUNTING STATION (CCS) OVERVIEW.....	3
Activities Conducted at the Central Counting Station	3
Location of the Central Counting Station.....	3
Central Counting Station Personnel.....	3
Mandatory Appointments	3
Optional Appointments	4
Authorized Persons in the Central Counting Station	4
Security and Livestream Requirements	4
Licensed Peace Officer Requirement.....	5
Livestreaming for Larger Counties.....	5
FINDINGS.....	6
CONCLUSION/FINAL ASSESSMENT.....	7



INTRODUCTION

The objective of this analysis is to explore the feasibility of Central Counting Stations' (CCS) compliance with the federal standards for a Sensitive Compartmented Information Facility (SCIF) directed by HB 1848, passed during the 88th Legislative Session.

References are made to the appropriate sections in the Texas Election Code, unless otherwise indicated.



SENSITIVE COMPARTMENTED INFORMATION FACILITY (SCIF)

A SCIF serves as a secure area where classified information can be handled, discussed, and stored and where procedural and physical measures prevent the free access of individuals.¹ A SCIF's purpose is to ensure that classified information is protected from unauthorized access, espionage, and other security threats.² SCIFs are designed with various security measures, including physical barriers, access controls, and secure communication systems, to maintain the confidentiality and integrity of classified information.

SCIFs can be permanent or temporary. Temporary SCIFs are generally used in support of tactical, contingency, and field-training operations for Department of Defense (DoD) personnel and for a limited time where physical security construction standards associated with permanent facilities are not possible.³ Permanent SCIFs must be accredited by the Defense Intelligence Agency's Office of Counterintelligence and Security (DAC) for all physical and technical security measures.⁴

SCIFs must be built to specific standards outlined in Intelligence Community Directive 705 (ICD 705) Building a SCIF involves multiple challenges and considerations due to the stringent security requirements. Here are some key aspects that contribute to the difficulty with this process:

- **Structural and Physical Security**—SCIFs require specialized construction materials that provide enhanced soundproofing, electromagnetic shielding, and physical security. Doors, hinges, and locks must adhere to stringent, vault-like requirements set forth in the ICD 705. Perimeter doors must implement two access control technologies. Doors and frames must also achieve the required Sound Transmission Class (STC) rating as the facility's walls.
- **Electrical**—Telephones, security and emergency systems, and all other electrical power systems must be dedicated to the SCIF. Any utilities entering into the SCIF must also terminate there, and not travel throughout the space.
- **Ductwork**—All ventilation units and ductwork must be equipped with barred barriers to prevent intrusion, with inspection ports installed inside the SCIF. All breaks must also be outfitted with special inserts that ensure audio and other electronic emanations do not leave the SCIF's space.
- **Intrusion Detection System (IDS)**—All areas providing access to a SCIF must be protected by an IDS using UL 2050 approved components and installed by a UL 2050 certified contractor.⁵
- **Acoustic Measures**—SCIFs perimeters must meet a STC of either 45 or 50, ensuring that all sounds within the SCIF are barely audible by the human ear from the outside.⁶
- **Visual Measures**—Design must ensure that no one can see what is transpiring inside the SCIF from any distance. Most SCIFs, for this reason, are constructed without windows.
- **Cost and Time**—Cost can vary widely based on factors such as size, and specific security features needed. A rough estimate for a small to medium-sized SCIF could start at several hundred thousand dollars and go up into the millions. Large-scale SCIF projects can easily surpass tens of millions of dollars.

Overall, constructing a SCIF requires coordination among architects, security experts, contractors, and government agencies to ensure compliance with security standards and regulations.

¹ [Sensitive Compartmented Information Facility Use \(SCIF\) Policy](#)

² [Sensitive Compartmented Information Facility Use \(SCIF\) Policy](#)

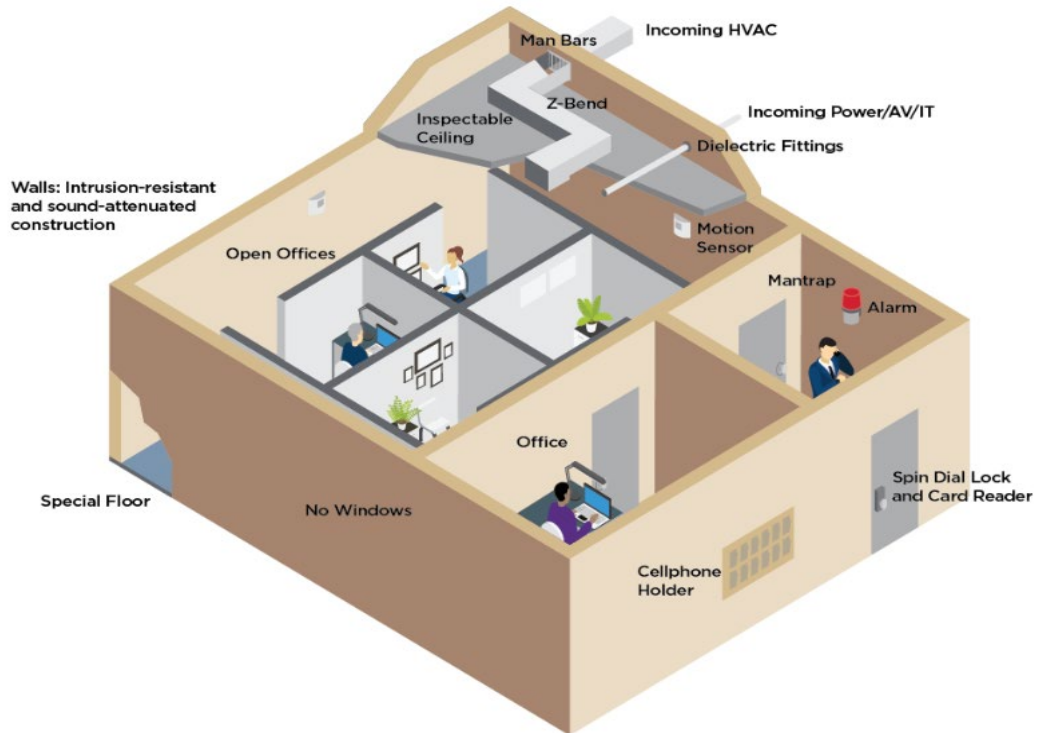
³ Department of Defense Manual 5105.21 pg. 11

⁴ Department of Defense Manual 5105.21 pg. 12

⁵ [What is UL 2050 Certification?](#)

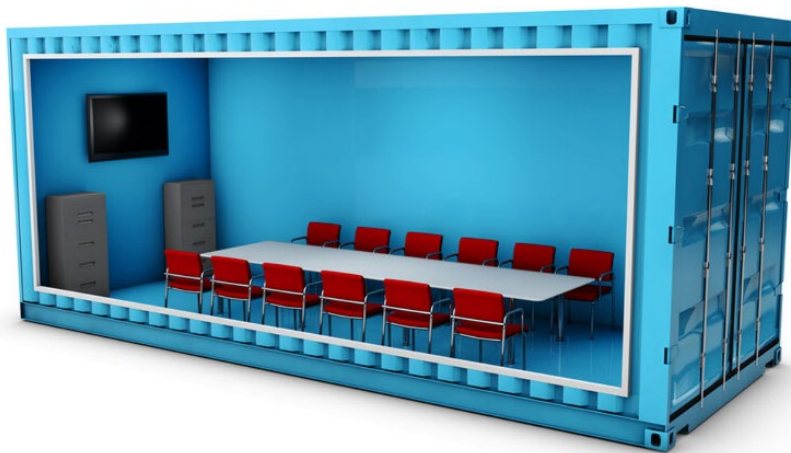
⁶ [How Sound Transmission Class Ratings Relates to SCIF Security](#)





Typical Elements of a SCIF⁷

Illustrative view of typical elements for SCIF construction to meet standards outlined in federal directives



Temporary/Deployable SCIF⁸

⁷ [Key Reasons Behind the Growing Demand for SCIFs](#)

⁸ [Creating Secured Areas – What is a SCIF?](#)

CENTRAL COUNTING STATION (CCS) OVERVIEW

A **Central Counting Station** is the location where ballots are counted, vote totals are accumulated, precinct returns are finalized, and unofficial election results are generated on election night. This is sometimes referred to as a **Central Accumulation Station** (CAS). Entities may choose to establish more than one CCS for an election, often called “regional substations,” but these must meet the same requirements as the main CCS. (Sec. 127.001)

Whether an entity needs a CCS depends on several factors, including the type of voting equipment used, the ballot counting process, and how results are generated.

Activities Conducted at the Central Counting Station

The primary functions of the CCS are to tabulate the results for the election and to receive ballots and other election materials from the polling places on election night and/or at the end of the early voting period.

The CCS is generally a high-activity location. Materials are delivered to the CCS by election workers from each polling place throughout the night on election night. CCS personnel receive those materials and tabulate the results of the election based on the ballots and electronic media from each of those locations.

Poll watchers and state inspectors are also authorized to be present to observe these intake and tabulation procedures, along with any other activities conducted at the CCS.

Location of the Central Counting Station

The CCS must be located within the county that the political subdivision serves, or in a neighboring county. It should have adequate space, storage, security, and access to necessary voting equipment and software. If the CCS is in an election office with other ongoing election activities, the CCS Manager can designate specific areas for the CCS’s operations. (Sec. 127.001)

Central Counting Station Personnel

Certain personnel must be appointed and present whenever the CCS is convened, with additional optional roles available for assisting in operations. Importantly, each individual at the CCS must perform only one role at a time, and no person can serve in multiple roles simultaneously.

The Election Code requires certain personnel to be present at each meeting of the CCS, and establishes specific eligibility requirements for each of these positions.

Mandatory Appointments

- **Central Counting Station Manager** (Sec. 127.002)—The CCS Manager oversees all operations of the CCS and must have a written plan for its functioning. This individual must be knowledgeable about the electronic voting system in use. Political subdivision employees are eligible to serve as the Manager and may receive additional compensation.
- **Tabulation Supervisor** (Sec. 127.003)—The Tabulation Supervisor is responsible for the operation of the tabulating equipment, vote accumulation, and security of the system. They must approve the program used for counting ballots and ensure the proper processing of votes, including generating unofficial results and overvote/undervote reports. The Tabulation Supervisor must be trained in the operation of the equipment.



- **Central Counting Station Presiding Judge** (Sec. 127.005)—The Presiding Judge maintains order at the CCS, administers oaths, and resolves questions regarding voter intent. If the Manager decides that ballots need to be duplicated or hand-counted, the Presiding Judge handles any issues related to voter intent. After the Tabulation Supervisor prepares the unofficial results, the Presiding Judge certifies their accuracy and ensures proper documentation. They also oversee the reconciliation process at the close of tabulation.
- **Central Counting Station Alternate Judge** (Sec. 127.005)—The Alternate Judge assumes the role of Presiding Judge if the Presiding Judge is unavailable. If both are present, the Alternate Judge assists with other duties as directed by the Presiding Judge.

Optional Appointments

In addition to mandatory roles, the Election Code allows for the appointment of optional personnel. These roles are not required but may assist in the CCS’s operations as needed.

- **Assistants to the Tabulation Supervisor** (Sec. 127.004)—One or more assistants may be appointed to help the Tabulation Supervisor operate the tabulating equipment and perform other duties as directed.
- **Central Counting Station Clerks** (Sec. 127.006)—Clerks are appointed by the CCS Manager, Presiding Judge, or Alternate Judge to assist with various tasks at the CCS.

Authorized Persons in the Central Counting Station

The Election Code allows several different types of individuals to be present at the CCS while counting activities are being conducted. This includes both the individuals who are performing specific duties related to the counting process at the central counting station and the individuals who are serving as authorized observers such as state inspectors or poll watchers.

Section 127.008 specifies who may be present at the CCS. Only authorized individuals are allowed in the CCS, including:

- **Mandatory and Optional Appointments**—CCS Manager, Tabulation Supervisor, Assistant to the Tabulation Supervisor, Presiding Judge, Alternate Judge, and Clerks.
- **Poll Watchers**—Authorized to observe the CCS during processing and preparation of election results. (Sec. 33.055)
- **State Inspectors**—Permitted to observe any activity at the CCS. (Secs. 34.002, 34.004)
- **Voting System Technicians**—Allowed for repairs, maintenance, or operation of the voting system. (Sec. 125.010)
- **County Election Officers**—May be present as necessary for election administration.
- **Other Authorized Individuals**—Includes individuals authorized by the Election Code, such as the county chair during a primary election or the local custodian of election records in cases where a local entity contracts election services with the county.

Security and Livestream Requirements

The CCS is subject to specific security protocols under the Election Code, including those for electronic voting equipment and media. The CCS Manager and Presiding Judge may implement procedures to ensure the integrity of the election process.

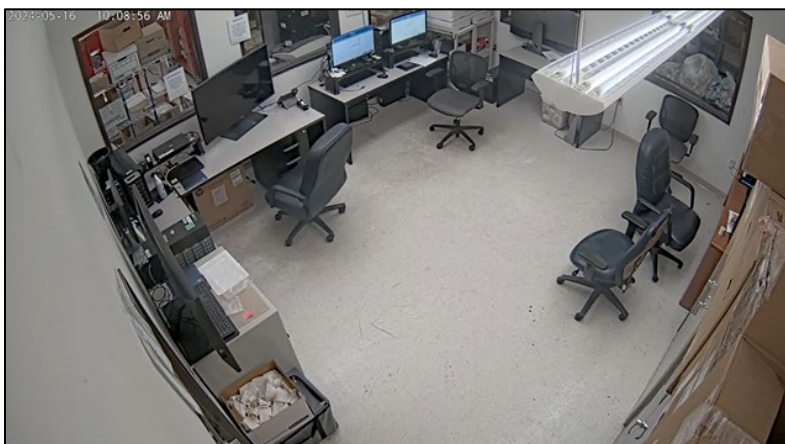
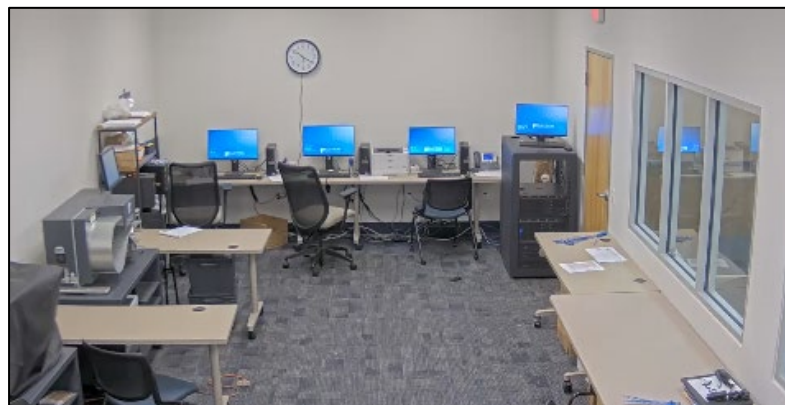


Licensed Peace Officer Requirement

A licensed peace officer must be posted at the CCS to secure ballot boxes and ensure the security of the tabulation process. This officer must be present whenever the CCS is convened, including for pre-election day counting or after-election day procedures like counting provisional ballots. The officer is not required when the CCS is not in session. (Sec. 127.1232)

Livestreaming for Larger Counties

In counties with populations over 100,000, the general custodian of election records must set up a video recording system to monitor all areas containing voted ballots. This system must also livestream the activity at the CCS from the time ballots arrive until the local canvass of election results. (Sec. 127.1232)



FINDINGS

Our office has identified four critical reasons that affect the feasibility of utilizing SCIF standards at a Central Counting Station:

1. **Transparency Degradation**—Applying SCIF standards to Central Counting Stations would hinder the transparency critical to our election process, particularly in how votes are tabulated and counted. SCIF requirements are highly restrictive, limiting visibility into the process, which is essential for ensuring that vote counting is not manipulated. Transparency in elections builds trust with voters and strengthens communication with counties, reducing misunderstandings and decreasing the likelihood of unethical behavior. Imposing SCIF standards may compromise this transparency and, ultimately, the integrity of the election process.
2. **Cost and Complexity**—The cost of building a SCIF can vary depending on size, security needs, type of construction, and several other factors like renovation, traditional ground-up, modular, and container construction. Potential cost of a SCIF: If you are building a SCIF of less than 200 square feet, it would be recommended that you budget a minimum of \$1,500 per square foot up to \$1,800. Inflation and the unavailability of certain products have caused building materials like steel studs, plywood, and drywall to increase in cost by more than 30%.⁹
3. **Operational Disruption**—Implementing SCIF level security would likely disrupt the normal operations of a Central Counting Station. Central Counting Stations need to be accessible to a large number of people and other citizens involved in elections permitted under state law. SCIF standards would impose severe restrictions on access and movement, hindering the accessibility and efficiency crucial during the tabulation process.
4. **Purpose Misalignment**—SCIFs are designed to protect against espionage and unauthorized access to highly sensitive national security information in which the unauthorized disclosure could reasonably be expected to cause exceptionally grave damage to national security.¹⁰ While securing the integrity of vote tabulation is critically important, the nature of the threat is different. The focus for Central Counting Stations is on preventing tampering, ensuring transparency, and maintaining chain-of-custody, which can be managed through rigorous but less extreme security measures.

⁹ [How Much Does It Cost To Build a SCIF or SAPF?](#)

¹⁰ [HQDA G-2 Information Security Classification Levels](#)



CONCLUSION/FINAL ASSESSMENT

In conclusion, there are more feasible approaches to ensuring a safe, secure, accessible, and transparent election process than implementing SCIF standards to a CCS. The implementation of SCIF standards for a CCS is not cost-effective and would hinder the transparency of vote counting and tabulation. Furthermore, given the current security measures and techniques being used, risk assessment mitigation tools, and enforcement of the Election Code, implementing SCIF standards at a CCS would be impractical.

Instead of using SCIF standards, the CCS can adopt tailored security measures that effectively address the specific risks associated with the electoral process within that county. These measures include:

- **Enhanced Physical Security**—Use of secure buildings with controlled access, surveillance cameras, and security personnel. Employ signage, barriers, lighting, cypher locks, screening equipment, and alarms to provide a more robust inner and outer perimeter (*Security-In-Depth/Layered Security*).
- **Enforcing Compliance with Established Laws**—Sec. 127.1232 states that to protect ballot boxes and the security of the tabulation procedures, a certified peace officer must be stationed at the CSS. Every time the CSS meets, even for pre-election day counting or post- election day processes like counting provisional ballots, this official is required to be present.
- **Cybersecurity Measures**—Protect electronic voting systems, equipment and database through robust cybersecurity protocols. Implement redundant systems and failover mechanisms to ensure that operations can continue smoothly in case of a system failure or cyberattack.
- **Transparency Oversight**—Allow observers, as authorized under the Election Code, to monitor the counting process. Where feasible, live stream key parts of the tabulation process so that the public can observe the proceedings in real time.

By focusing on security measures that are specifically designed to address the unique needs and threats associated with the CCS and that county, election officials can better protect the integrity of the electoral process in a practical and cost-effective manner.

