

What State Election Officials Should Know About How VVSG 2.0 Impacts Which Voting Systems Can Be Used

January 2025

What Are States' Responsibilities for Certification?

In the United States, state governments and chief election officials have a large amount of autonomy to set certain standards and rules surrounding election administration. This extends to the testing and certification of voting systems, with states having complete control over which voting systems can be used in their states and the requirements that must be met for their use. Currently, states have three main options: they can rely on the standards and requirements set forth by the US Election Assistance Commission (EAC), they can choose which of the existing Voluntary Voting System Guidelines (VVSG) standards and requirements to include or exclude in their state, or they can adopt their own unique set of standards and requirements.

The VVSG are a set of requirements for voting systems to be tested against. Responsibility for developing the VVSG was assigned in the Help America Vote Act of 2002 (HAVA) primarily to the EAC, with roles for the general public, the National Institute of Standards and Technology (NIST), and three EAC advisory bodies. The latest standards adopted by the EAC are known as VVSG 2.0. VVSG 2.0 represents a long-awaited update to the original VVSG 1.0 guidelines, which were adopted in 2005 before the first iPhones were introduced. All currently EAC certified systems are certified to VVSG 1.0. As of November 16, 2023, any new system submitted for testing will now be certified to the latest VVSG 2.0 standards.

How Does VVSG 2.0 Impact State Certification?

With VVSG 2.0, each state still has the autonomy to choose which voting systems can be used in their state, what standards are used for testing, and what the rules are for their approval for use. States don't have to make any changes because of these new guidelines, but they can and probably should.

Currently certified voting systems under VVSG 1.0 will not be decertified and are still safe and accurate for jurisdictions to continue using. With a long lifecycle for equipment, many voting systems certified to VVSG 1.0 may remain in use for many years to come before local jurisdictions transition to new systems.

States should look at their statutory and regulatory requirements around voting systems to make sure they accurately represent the needs of their particular state. For some state election officials, depending on the current regulations and statutes in place, there may not be a choice on whether to adopt VVSG 2.0 but rather a question of how and when to make a formal transition to VVSG 2.0 systems. Some of the most important considerations will be around the timing of that potential transition, including whether to allow upgrades to systems that remain in place or are certified to previous standards while VVSG 2.0-compliant systems are still undergoing development and testing.

What Are the Key Elements of VVSG 2.0?


The new VVSG 2.0 guidelines contain information on updated testing requirements and enhancements to the current standards, but the most important updates are related to Security, Accessibility, Auditability, Interoperability, Documentation, and User-Centered Design. The graphic in this paper details key changes for each of these elements that are new to VVSG 2.0, including requirements like Multi-Factor Authentication (MFA) for voting system

KEY ELEMENTS OF VVSG 2.0

Pertaining to Voting Systems


SECURITY

All components of voting systems must now use multi-factor authentication. Voting systems must also provide digitally signed Cast Vote Records.




ACCESSIBILITY

Voters with disabilities must be able to mark, verify, and cast their ballot without physically handling it.




AUDITABILITY

Voting system must be able to produce and print a unique identifier on each ballot.




INTEROPERABILITY

All voting systems must support common data formats. Proprietary data formats will be prohibited for VVSG 2.0 systems.




DOCUMENTATION

Voting system vendors must provide a supply chain risk assessment strategy, an assessment of vulnerabilities, and describe how common data formats are used.



USER-CENTERED DESIGN

Voting systems must undergo usability testing for poll workers and voters and document the design and feedback process.



components, common data formats, and unique identifiers.

While these are some of the key updates to VVSG 2.0, state certifying authorities will continue to have the ability to determine which guidelines are most appropriate for their state. States can choose to defer or require specific requirements within the new VVSG 2.0 guidelines for certification in their state based on their own processes and laws.

Learning More

For state election officials looking to learn more about VVSG 2.0, the EAC has numerous helpful resources on their website, which can be found at www.eac.gov. State officials should also speak directly with their voting system partners to learn more about their plans and how they are working to address VVSG 2.0. Our certification and product teams are available to talk to any state about their potential transition timelines or to answer any questions about how the guidelines themselves would apply to the states' processes. You can reach out directly to our Director of Strategic Partnerships, Steve Trout, at steve.trout@clearballot.com.

ABOUT CLEAR BALLOT

As the leader in election innovation, Clear Ballot has introduced a new class of tools and a modern approach to voting, enabling unprecedented speed, accuracy, and transparency that officials and the voting public have sought for decades. Clear Ballot entered the election industry with its first product in 2012, disrupting the industry with the nation's first independent, automated audit, and four years later developed a complete voting system which is now the fastest growing voting system in the industry. Clear Ballot's election technology is currently used in thirteen states, serving more than 45 million registered voters.