OFFICE OF INSPECTOR GENERAL

U.S. Election Assistance Commission

Interim Report

REVIEW OF PHYSICAL CONFIGURATION AUDITS SUPPORTING EAC VOTING SYSTEM CERTIFICATIONS



Report No. P26HQ0007-27-01
October 22, 2026

HIGHLIGHTS

REVIEW OF PHYSICAL CONFIGURATION AUDITS SUPPORTING EAC VOTING SYSTEM CERTIFICATIONS

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What OIG Reviewed

The EAC Office of Inspector General (OIG) is reviewing whether selected physical configuration audits complied with applicable requirements and provided reasonable assurance that voting system configurations certified by the EAC were those subjected to certification testing.

This interim report addresses a discrepancy involving a scanner erroneously listed in the certified configuration of a voting system. OIG is reporting these results before completing its broader review because the discrepancy's practical impact appears limited and corrective action can be taken immediately.

What OIG Found

OIG confirmed that the EAC's Certificate of Conformance for Democracy Suite 5.20 erroneously listed a scanner that had not been tested by the voting system test laboratory.

However, OIG found no evidence that the scanner was sold to jurisdictions as part of the certified system. The EAC certified Democracy Suite 5.20 in February 2025, while manufacturer records indicate that the scanner was last sold to a jurisdiction in September 2022.

Accordingly, although the certification documentation inaccurately identified the system's configuration, OIG determined that the discrepancy had limited practical impact.

What OIG Recommended

OIG recommended that the EAC correct the Democracy Suite 5.20 voting system’s Certificate of Conformance and other public-facing supporting documents to accurately reflect the components tested, working with the voting system test laboratory and manufacturer as necessary.

U.S. ELECTION ASSISTANCE COMMISSION
OFFICE OF INSPECTOR GENERAL

DATE: October 22, 2026

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

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

SUBJECT: Interim Report: Review of Physical Configuration Audits Supporting EAC Voting System Certifications (Report No. P26HQ0007-27-01)

This memorandum transmits the interim report on the OIG's review of physical configuration audits supporting EAC voting system certifications. We are issuing this report before completing our broader review because the discrepancy's practical impact appears limited and the EAC can take immediate corrective action.

We considered management's comments in finalizing the report and have included them in their entirety in Appendix B. We agree with management's planned actions to address the recommendation and will monitor their implementation. Please keep us informed of progress toward completion.

We appreciate the assistance and cooperation you and your staff have provided during this review.

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Background

The Help America Vote Act of 2002 established a federal program for the testing and certification of voting systems and assigned the U.S. Election Assistance Commission (EAC) responsibility for administering the program. Under the program, voting system manufacturers submit systems for testing by an EAC-accredited voting system test laboratory (VSTL). The VSTL evaluates the system against the applicable Voluntary Voting System Guidelines (VVSG) and other EAC requirements and reports the results to the EAC. EAC certification signifies that the system tested by the VSTL successfully met the applicable requirements of the VVSG.

An important part of this process is establishing and maintaining the configuration of the voting system being evaluated. Voting systems can consist of numerous hardware, software, firmware, and commercial-off-the-shelf components, and different versions of a system may contain different combinations or versions of those components. Accordingly, the integrity of certification testing depends not only on whether the required tests were performed, but also on whether the components subjected to those tests are accurately identified and controlled throughout the test campaign.

A physical configuration audit, or PCA, is one of the mechanisms used to establish and verify the configuration of a voting system submitted for certification testing. The PCA compares the voting system components submitted for testing with the manufacturer's technical documentation and establishes a baseline identifying the hardware and software that comprise the system under test. Together with other configuration-control activities, the PCA helps to establish a traceable relationship among the system described by the manufacturer, the system physically presented to the laboratory, and the system actually subjected to certification testing.

Why This Review Was Initiated

The EAC Office of Inspector General (OIG) initiated this review after receiving a hotline complaint concerning the EAC's certification of the Democracy Suite 5.20 voting system. The complaint, which was received August 23, 2026, raised concerns that a scanner was included within the configuration certified by the EAC even though the scanner had not been tested by Pro V&V, the VSTL, as part of the certification campaign.

After receiving the complaint, OIG discussed the matter with EAC officials. They confirmed the underlying configuration discrepancy—the EAC-certified configuration erroneously listed a scanner that was not part of the system submitted for testing—and requested that OIG independently review the matter.

The discrepancy raised broader questions about the controls used to identify and document the hardware components included in voting systems undergoing certification testing and the extent to which the EAC can rely on VSTL documentation to determine precisely which

components were tested. Because the PCA is a key mechanism for establishing and documenting the configuration subjected to certification testing, OIG initiated this review to determine whether the issue identified with Democracy Suite 5.20 was isolated or indicative of broader weaknesses in the testing and certification process. OIG is limiting the scope of the review to certified voting systems that were tested by Pro V&V and are reported as actively deployed.

This report provides interim results related to the impact of the scanner's erroneous inclusion in the EAC-certified configuration of the Democracy Suite 5.20 voting system. Because OIG determined that the practical impact of the Democracy Suite 5.20 discrepancy was limited and identified corrective actions that could be taken immediately, we are reporting these results while our broader review continues.

Scanner Was Not Deployed as Part of Democracy Suite 5.20, Limiting the Impact of the Certification Discrepancy

Although the EAC's certification of the Democracy Suite 5.20 voting system listed a scanner that was not part of the system submitted for testing, OIG found no evidence that the scanner was sold to jurisdictions as part of the certified system's configuration. The Democracy Suite 5.20 system was certified by the EAC in February 2025, while manufacturer records reflect that the scanner in question was last sold to a jurisdiction in September 2022. Because the scanner was not deployed as part of the certified system, the practical impact of this discrepancy was limited.

According to officials, the scanner was never intended for inclusion in the voting system configuration. A component list from a prior custom voting system configuration, which included the scanner, was incorrectly submitted with initial manufacturer paperwork, and the error was not identified through subsequent testing and certification documentation reviews. Nonetheless, listing an extraneous component in an EAC-certified configuration represents a breakdown in the controls intended to ensure that certified voting system configurations accurately reflect the components subjected to certification testing.

OIG's ongoing review will assess the documentation available to support the VSTL's PCA process for additional selected voting systems. OIG notes that Pro V&V has already agreed to revise its policy and procedures "to require reconciliation of manufacturer-provided configuration information with the applicable certification baseline and physical/configuration records before certification documentation is finalized."

As an immediate corrective action, OIG recommends that the EAC:

1. Correct the Democracy Suite 5.20 voting system's Certificate of Conformance and other public-facing supporting documents to accurately reflect the components tested, working with the voting system test laboratory and manufacturer as necessary.

Summary of Management Comments

OIG provided the draft report to the EAC on October 14, 2026, and received management's response on October 21, 2026. The EAC concurred with the report's recommendation and indicated that corrective actions would be completed by October 26, 2026. OIG agrees with management's planned actions to address the recommendation. The EAC's response is included in its entirety in Appendix B.

Appendix A. Scope and Methodology

OIG initiated this review in September 2026 to determine whether selected physical configuration audits supporting EAC voting system certification decisions complied with EAC requirements and voting system standards, and whether the resulting documentation provided reasonable assurance that the configurations certified by the EAC were the configurations subjected to certification testing. It is being conducted in accordance with the *Quality Standards for Inspection and Evaluation*, issued by the Council of the Inspectors General on Integrity and Efficiency.

OIG's review encompasses selected EAC voting system certifications for which Pro V&V served as the VSTL. The work includes reviewing applicable EAC requirements, voting system standards, and laboratory accreditation requirements; certification and testing documentation; and information obtained from EAC officials, Pro V&V, voting system manufacturers, and other relevant sources, as appropriate.

During the review, OIG identified matters that warranted communication to EAC management and its stakeholders before completion of all planned review procedures. Accordingly, this interim report presents the results of the work completed to date that was necessary to support the findings and conclusions presented herein.

To develop this interim report, OIG:

- Reviewed and analyzed voting system certification requirements related to configuration control. This included:
    - Voluntary Voting System Guidelines 1.0, Volume 2
    - Voluntary Voting System Guidelines 1.1, Volume 2
    - Voluntary Voting System Guidelines 2.0
    - EAC Voting System Testing and Certification Program Manual, Version 3.0
    - EAC Voting System Test Laboratory Program Manual, Version 3.1.
    - NIST Handbook 150-22:2021
- Met with officials from the EAC's Testing and Certification Office, the VSTL (Pro V&V), and the Democracy Suite 5.20 manufacturer (Liberty Vote USA Inc.).
- Reviewed the Certificate of Conformance and other documentation supporting the EAC's certification of the Democracy Suite 5.20 voting system.
- Reviewed invoice records maintained by Liberty Vote USA, Inc. to identify when the PCOS-321C scanner was last sold to jurisdictions.

- Reviewed documentation supporting corrective actions taken and planned by the EAC and Pro V&V to address identified issues.

Our broader review remains ongoing. We have not completed all planned procedures for the systems included in our review, and this interim report does not present conclusions regarding matters outside the scope of the findings described herein. We expect to report the results of our remaining work separately.

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

MEMORANDUM

DATE: October 21, 2026

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

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

SUBJECT: EAC Response to Draft Interim Report: Review of Physical Configuration Audits Supporting EAC Voting System Certifications (Report No. P26HQ0007-27-XX)

Thank you for the opportunity to review and comment on the Office of Inspector General's (OIG) draft interim report, Review of Physical Configuration Audits Supporting EAC Voting System Certifications. The U.S. Election Assistance Commission (EAC) appreciates OIG's work on this matter and the professionalism of OIG staff throughout the review.

The accuracy of certification documentation is central to the integrity of the EAC's Testing and Certification Program. Election officials, manufacturers, and the public rely on the Certificate of Conformance and its supporting materials to understand exactly which components were tested and certified. As the OIG report states, the EAC confirmed that the manufacturer's documentation for the Democracy Suite 5.20 system erroneously listed a scanner that was not intended to be included in the system configuration. The EAC agrees that the certification record for Democracy Suite 5.20 should be corrected. Despite the scanner not being deployed as part of this system, the EAC is taking this matter seriously and responding promptly.

Recommendation 1

Correct the Democracy Suite 5.20 voting system's Certificate of Conformance and other public-facing supporting documents to accurately reflect the components tested, working with the voting system test laboratory and manufacturer as necessary.

EAC Response: The EAC agrees with the recommendation.

When this matter was brought to the EAC's attention, the Testing and Certification Program confirmed the scanner was erroneously included in the manufacturer's system documents and, in addition to supporting OIG's review, initiated a separate process with the voting system test laboratory (VSTL) under Chapter 4 of the EAC Voting System Test Laboratory Program Manual, Version 3.1. That process includes the assessment of the laboratory's conformance with

program requirements, the identification of any required corrective action, and verification by the Program Director that corrective actions have been implemented and are effective. This process is ongoing, and the EAC will carry it through to resolution in accordance with the Program Manual.

To address the recommendation, the EAC will take the following actions:

1. Coordinate with the VSTL and the manufacturer to verify the complete system configuration documented in the certification record and obtain corrected certification documentation that accurately identifies all components subjected to certification testing.
2. Review the corrected documentation and issue a revised Certificate of Conformance and scope of certification for Democracy Suite 5.20.
3. Update the public-facing certification materials for Democracy Suite 5.20 on the EAC website to reflect the corrected configuration.

Rather than limiting its review to the single component identified in the report, the EAC is verifying the full system configuration documented in the Democracy Suite 5.20 certification record against the components subjected to certification testing. This verification is being conducted in coordination with the process described above to ensure the integrity and accuracy of the entire certified configuration before revised materials are issued. The EAC has prioritized this work and is expediting its completion, so election officials and the public have an accurate and complete certification record as soon as possible. Upon completion, the EAC will provide OIG with the revised Certificate of Conformance and supporting documentation to support closure of the recommendation.

Target Completion Date: October 26, 2026

The EAC remains committed to supporting OIG's broader review and will continue to provide information and assistance as needed.



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U.S. Election Assistance Commission
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