



U.S. ELECTION ASSISTANCE COMMISSION  
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Section 231 of the [Help America Vote Act \(HAVA\)](#), codified at 52 U.S. Code § 20971, governs the accreditation of Voting System Test Laboratories (VSTLs). Section 231 requires that accreditation be approved by a vote of the Commission. Therefore, accreditation is granted upon a vote of the Commission. Section 231 also confirms that accreditation may not be revoked unless the revocation is approved by a vote of the Commission. [SLI Compliance](#) is an EAC accredited VSTL originally accredited by the EAC on February 28, 2007. EAC Commissioners voted on the accreditation of SLI Compliance to VVSG 2.0 on November 15, 2022. [Pro V&V](#) is an EAC accredited VSTL originally accredited by the EAC on February 24, 2015. EAC Commissioners voted on the accreditation of Pro V&V to VVSG 2.0 on December 21, 2022.

Section 3.6 of the EAC [Voting System Test Laboratory Program Manual Version 3.0](#) (Program Manual) covers processes for original grants of accreditation. Section 3.6 states that upon a vote of the EAC Commissioners to accredit a laboratory, the Program Director will issue a Certificate of Accreditation. The original Certificate of Accreditation for Pro V&V is available [here](#) and the original Certificate of Accreditation for SLI Compliance (formerly SysTest Labs) can be found [here](#). Certificates are intended to memorialize the vote of the Commission, which grants actual accreditation. This is distinct from the VSTL Certificate of Accreditation that is issued after the EAC performs a VSTL audit, which relates to the agency policy to reassess VSTLs periodically to ensure conformance to the requirements of the testing and certification program for a VSTL. The EAC has [previously explained](#) that the certificates issued following an audit are distinct from the original grant of accreditation, which can only be accomplished through a vote of the Commission, and similarly can only be revoked by a vote of the Commission. A failure to issue an updated VSTL Certificate of Accreditation does not indicate the lab is no longer accredited. Moreover, the EAC has never voted to revoke VSTL accreditation. In 2021, the Commission [decided](#) to remove expiration dates on Certificates of Accreditation to avoid public confusion on status of accreditation as distinguished from periodic reassessment.

Recently, the EAC has received questions pertaining to signatures on VSTL Certificates of Accreditation. Specifically, Section 3.6 of the Program Manual states that the Chair shall sign the certificates. However, certificates include the signature of the Executive Director. Pursuant to the [EAC Organizational Management Policy, adopted in 2015](#), the EAC Executive Director is delegated the authority to implement policy. The EAC views the signature from the Executive Director on the Certificates of Accreditation as an execution of his delegated authority to implement policy, in this case implementing the original vote of accreditation by the Commissioners and implementing the Program Manual.

The EAC recognizes that the language in the Program Manual may create confusion and is working to correct language in the Program Manual for additional clarity. However, accreditation or revocation of accreditation can only be accomplished through a vote of the Commission. Both SLI Compliance and Pro V&V are accredited VSTLs through a vote of the Commission. Additionally, both SLI Compliance and Pro V&V have recently completed program audits successfully for the testing of voting systems to the Voluntary Voting Systems Guidelines VVSG 1.0, 1.1 & 2.0. SLI Compliance completed the most recent audit on August 31, 2022, and Pro V&V completed the audit on December 15, 2022.