



U.S. ELECTION ASSISTANCE COMMISSION

633 3rd St. NW, Suite 200

Washington, DC 20001

EAC Decision on Request for Interpretation

2021-02 13.2 Source and Integrity of Election Records

VVSG 2.0 Principle 13 – Data Protection

Guideline 13.2:

The source and integrity of electronic tabulation reports are verifiable.

Sections of Standards or Guidelines:

13.2-A – Signing stored election records

Cast vote records and ballot images must be digitally signed when stored and before being transmitted.

Date:

July 12th, 2021

Question(s):

Does the requirement for digital signing of cast vote records (CVRs) apply to common data format exchanges (CDFs)?

Discussion:

The context of this question is with respect to Principle 4 – Interoperability. Principle 4 does not prescribe data protections within the requirements of that section, nor do the currently published CDF specifications. While Principle 13 – Data Protection does not explicitly call out that it is applicable to CDF exchanges, it does apply to the data contained within the CDFs themselves.

Guideline 13.2 – Source and integrity of election records covers the requirement that cast vote records (CVRs) and ballot images be digitally signed both when stored and before being transmitted. The EMS needs to be able to cryptographically certify all electronic voting records. Digital signatures are a form of integrity protection that can also help trace the source of any updates or alterations to election records.

This is one example of how Principle 13 applies to CDF data exchanges. This RFI is intended to make it clear that data protection requirements within VVSG 2.0 apply to CDFs where possible.

Conclusion:

It is a requirement of 13.2-A that CVRs, including CDFs that contain CVRs, must be digitally signed when stored and before being transmitted.



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Effective Date:

As of the date this document is published.