



N **RTH CAROLINA**

State Board *of* Elections

Electronic Poll Book System Certification Program

Adopted September 5, 2024

Alan Hirsch
CHAIR

Jeff Carmon
SECRETARY

Stacy Eggers IV
MEMBER

Kevin N. Lewis
MEMBER

Siobhan O'Duffy Millen
MEMBER

Contents

Chapter 1: General Overview.....	5
1.1. Purpose of Procedures.....	5
1.2. Definitions/Terminology	5
1.3. Authority	7
1.4. Ongoing Compliance and Alteration to Program Requirements	8
1.5. General Requirements and Considerations	9
1.6. EPB Systems Permitted to be Used Prior to Adoption of Certification Program.....	9
Chapter 2: Legal and Financial Requirements	11
2.1. Vendor Recognizes the State Board’s Authority.....	11
2.2. Vendor Has Independent Duty to Obey the Law and Stay Informed of Legal Changes	11
2.3. Vendor May Not Sell Uncertified Products.....	11
2.4. Vendor Must Bear Costs	12
2.5. Vendor Must Designate Proprietary Information.....	12
2.6. Vendor Must Make EPB Model Available	12
2.7. Vendor Must Provide Training and Assistance During Review	13
2.8. Vendor Must Provide Information to NCSBE Upon Request	13
2.9. Vendor Must Comply with Escrow Requirements	13
2.10. Vendor Must Post a Bond or Letter of Credit	14
2.11. Vendor Must Provide a Statewide Uniform Price and Standard Purchase Contract.....	15
2.12. Vendor Must Grant State Board Privity of Contract	16
Chapter 3: Certification Review and Approval Process	17
3.1. Certification Review Process.....	17
Phase 1: Letter of Application for Certification	17
Phase 2: Review of Application	20
Phase 3: Independent Testing Authority Review for State Compliance	21
Phase 4: Decision by the State Board of Elections.....	22
3.2. Incomplete Certification Process	22
Chapter 4: Testing Levels; System Elements and Criteria	23

4.1. Federal Compliance Testing.....	23
4.2. State Certification Testing.....	23
Hardware, Infrastructure, or Component Elements.....	24
Software Elements	24
Security Compliance and Numbered Memoranda	24
4.3. Acceptance Testing	25
Chapter 5: Maintaining Certification, Suspension, Decertification	26
5.1. Maintaining Certification	26
Program Oversight	26
Requirements Upon Certification	26
Requirements Upon Securing a Contract to Provide an EPB System to a County.....	26
Select Ongoing Requirements.....	26
5.2 Suspension of Use of EPB System	27
5.3. Decertification of EPB System.....	28
Chapter 6: Minor Changes and Modifications	30
6.1. Minor Change.....	30
6.2. Modification.....	30
Appendix A: Acceptance Test	32
Appendix B: Checklist – Legal Requirements, Test Assertions, & Security	34
Appendix C: Letter of Application Checklist.....	40

Chapter 1: General Overview

1.1. Purpose of Procedures

The procedures for the State Board of Elections (State Board or NCSBE) Electronic Poll Book System Certification Program outlined in this document define the process for vendors seeking to gain certification of an electronic poll book (EPB) system for use in elections in North Carolina. These procedures are designed to:

1. Provide the State Board’s interpretation of the legal and functional requirements for EPB systems in North Carolina to promote a systematic and transparent certification process for EPB vendors wishing to do business in North Carolina;
2. Ensure that EPB systems and vendors, as well as county boards of elections, conform to North Carolina election laws and administrative code provisions relating to the certification, sale, acquisition, and use and maintenance of EPB systems;
3. Describe the manner in which the State Board will evaluate additional capabilities and changes in the method of operation for EPB systems previously certified for use in North Carolina, including minor changes, modifications, and new versions or systems;
4. Ensure a streamlined process for the suspension and decertification of already-certified EPB systems.

Under state law in North Carolina, only electronic poll books “that have been certified by the State Board in accordance with procedures and subject to standards adopted by the State Board, or which have been developed or maintained by the State Board, shall be permitted for use in elections in this State.” N.C.G.S. § 163-165.7. Accordingly, compliance with the certification procedures in this document is required for an EPB system to be certified for use in North Carolina, unless that system was developed or is maintained by the State Board of Elections.

1.2. Definitions/Terminology

Anomaly – An unexpected functioning of the electronic poll book in its operation. This means any event related to the security or functioning of the EPB system that is out of the ordinary; a deviation from the norm. Reference: 08 NCAC 4 .0402(c)(5).

Authorized User – An individual designated by the State Board or a purchasing county board of elections to operate and maintain the EPB system. For example, a precinct official assigned to the check-in station at a voting place on Election Day would be an authorized user. Reference: 08 NCAC 4 .0401(a)(4).

Ballot Style – The version of a ballot within a jurisdiction that an individual voter is eligible to vote. For example, in a county that uses essentially the same official ballot, a group office such as county commissioner may be divided into districts so that different voters in the same county vote for a commissioner in different districts. The county's different ballot styles are the different versions of the county's official ballot containing only those district ballot items one individual voter may vote. Reference: N.C.G.S. § 163-165(3).

Certification Procedures – The procedures described in this document implementing the State Board's interpretation of the legal and functional requirements, standards, and procedures for EPB systems to attain certification for use in elections in North Carolina.

Election – The event in which voters cast votes in ballot items concerning proposals or candidates for office in this state or the United States. The term includes primaries, second primaries, general elections, municipal elections, referenda, special elections, and runoff elections. Reference: N.C.G.S. § 163-165(4).

Electronic Poll Book (EPB) System – A system (including hardware, software, and firmware) used to check the registration of voters who appear to vote in person, to assign voters their correct ballots, and to record the voters' check-in and acceptance of ballots. The term "electronic poll book system" or "EPB system" refers to the total combination of mechanical, electro-mechanical, electronic, and digital equipment (including the software, firmware, and documentation required to program, control, and support the equipment). Reference: 08 NCAC 4 .0401(a).

Incident – An event related to the security or functioning of the electronic poll book that contributed to, caused, or may have caused any of the following:

- (A) An interruption to the voter check-in process, reporting process, or both processes.
- (B) An unauthorized disclosure of voter information.
- (C) An unauthorized access to the electronic poll book.
- (D) The software or data of the electronic poll book to become unreliable or corrupt.

Reference: 08 NCAC 04 .0402(c)(5).

Independent Testing Authority – Independent testing laboratory accredited by or partnered with a federal agency or a testing program administered by an independent organization that is accredited by or partnered with a federal agency. Reference: 08 NCAC 4 .0401(a)(1), (b)(3).

Minor Change – A change to a certified EPB system’s hardware, software, Technical Data Package (TDP), or data, where the nature of changes will not materially alter the system’s reliability, functionality, capability, or operation. Under no circumstance shall a change be considered a minor change if it has reasonable and identifiable potential to impact the system’s performance and compliance with an applicable EPB Standard. Minor changes include manufacturer enhancements. Reference: 08 NCAC 4 .0402(b).

Modification – A change to a certified EPB system that is not a minor change. Reference: 08 NCAC 4 .0402(b).

State Elections Information Management System (SEIMS) – The NCSBE is responsible for the development and implementation of a statewide computerized voter registration system to facilitate voter registration and to provide a central database containing voter registration information for each county. The system serves as the single system for storing and managing the official list of registered voters in the state and is the official voter registration list for the conduct of all elections in the state. Reference: 08 NCAC 4 .0401(a)(12).

State Network – Any connectivity designed for the purpose of providing Internet Protocol transport of information for State agencies. Reference: 08 NCAC 04 .0401(b)(1)(B) and G.S. 143B-1370(a)(5)g.

Voting Precinct – The proper precinct for a voter based on the residence where a voter has resided for at least 30 days prior to the date of an election, regardless of the voting place or precinct where a voter has cast his ballot. Reference: N.C.G.S. § 163-55.

1.3. Authority

The State Board, under the authority granted to it in the North Carolina General Statutes, has general supervision over the primaries and elections in North Carolina, has the authority to make any reasonable rules and regulations with respect to the conduct of primaries and elections as it deems advisable, provided they do not conflict with any other provisions of the law, and is required to investigate irregularities and to ensure the overall integrity of the elections process. The State Board has been granted further authority in the North Carolina General Statutes to certify EPB systems in accordance with procedures and standards adopted by the State Board. Consistent with this authority, the State Board has adopted rules in the North Carolina Administrative Code establishing certain procedures and standards applicable to

the certification of EPBs. The certification procedures outlined in this document, which further define and explain the legal and functional requirements for certified EPBs, are applicable to all county boards of elections (CBE) in North Carolina and EPB vendors seeking to qualify for and maintain certification of an electronic poll book for use in elections in North Carolina. The standards and procedures outlined in this document apply to the administration of all elections in this state, including elections involving federal, state, county, municipal and referenda contests. County boards of elections shall only contract with EPB vendors offering an EPB that has been certified in accordance with this certification program and may only purchase and use EPB systems from those vendors that have been and remain certified in accordance with this certification program.

The State Board's Executive Director is empowered to act under the State Board's authority in all matters associated with this certification program, whether derived from statute or administrative rule, and may perform any act of the State Board described herein, unless otherwise provided. The State Board may revise or revoke any such act by the Executive Director upon a majority vote.

Relevant North Carolina General Statutes and Administrative Code:

- [N.C.G.S. § 163-165.7](#) Voting systems: powers and duties of State Board
- [N.C.G.S. § 163-165.9A](#) Voting systems: requirements for voting systems vendors; penalties
- [N.C.G.S. § 163-166.7](#) Voting procedures
- [08 NCAC 04 .0401](#) Standards for certification of electronic poll books
- [08 NCAC 04 .0402](#) Procedures for certification of electronic poll books
- [08 NCAC 04 .0308](#) Authorized Access to Voting System Information in Escrow

1.4. Ongoing Compliance and Alteration to Program Requirements

Certification of an EPB system occurs through a vote in the affirmative from a majority of the appointed members of the State Board. Certification is a status to be maintained, not a terminal event. All vendors seeking initial and continued certification of an EPB system for use in North Carolina must comply with all certification procedures in this document, including subsequent versions. The State Board members may, by a majority vote, revise this document. Prior certification in no way restricts the authority of the State Board to alter certification requirements or procedures or to make demands of certified vendors in furtherance of this

certification program, either directly by a majority of its appointed members or through its Executive Director, in accord with applicable law.

1.5. General Requirements and Considerations

1. Compliance with the North Carolina General Statutes and Administrative Code rules applicable to electronic poll books, as explained by this certification program, must be substantiated by an Independent Testing Authority. Permissible independent testing authorities include a Voting Systems Testing Laboratory (VSTL) recognized by the National Institute of Standards and Technology (NIST), the Center for Internet Security (CIS) Rapid Architecture-Based Election Technology Verification (RABET-V) program, the United States Election Assistance Commission (EAC) Election Supporting Technology Evaluation Program (ESTEP), and the like.
2. To qualify for certification by NCSBE for use in any election in North Carolina, an EPB must fulfill the requirements listed in 08 NCAC 04 .0401(a), as further described in this document. The ability to meet these requirements are tested through the Test Assertions in Appendix B.
3. Any modification to the hardware, software, firmware, infrastructure, or any component of a certified EPB may invalidate the prior certification unless NCSBE has reviewed and determined that the change does not affect the accuracy, reliability, security, usability or accessibility of the system.

1.6. EPB Systems Permitted to be Used Prior to Adoption of Certification Program

EPB systems that were permitted by NCSBE to be used in North Carolina prior to the date on which this certification program is initially approved by the State Board and that are currently used by a CBE, other than those developed or maintained by the State Board of Elections, will be provisionally permitted for a period of six (6) months, except that any such vendor must initiate the certification review and approval process, in the manner provided in Chapter 4 of this document, before the expiration of that six month period in order to continue to be used beyond that time period by those CBEs. Provisional permission described in this paragraph is intended to allow existing vendors with existing contracts with counties in North Carolina to meet all certification requirements of this program and does not certify systems otherwise not permitted under state law. Any minor changes or modifications to, or new versions of, EPB systems that were permitted to be used prior to the adoption of this certification program must

be submitted to NCSBE in accordance with the processes for review of such minor changes or modifications in this certification program.

Provisional permission under this section does not mean a county seeking to acquire an EPB system after the initial approval of the certification program by the State Board may acquire the EPB systems that qualify for this provisional permission period. County boards may only acquire EPB systems newly certified pursuant to this certification program.

Chapter 2: Legal and Financial Requirements

2.1. Vendor Recognizes the State Board's Authority

By applying for certification, accepting certification, and/or operating within North Carolina, a vendor expressly recognizes the authority of the State Board under all applicable law and the terms of this program, understanding that certification is subject to ongoing compliance with the legal requirements to attain or maintain certification. The vendor further expressly recognizes that maintaining certification is conditioned on further compliance with those requirements, including that (1) when seeking certification, it must respond to State Board requests for information and documentation required to be provided by law as discussed below; and (2) to maintain certification once certified, it must submit State Board-requested changes to the EPB to the State Board to ensure continued compliance with state and federal law.

2.2. Vendor Has Independent Duty to Obey the Law and Stay Informed of Legal Changes

Seeking or attaining certification under this program does not negate the vendor's obligations under applicable state or federal law, and the vendor is alone responsible to ensure it is aware of all legal requirements governing certification of its EPB system and operation as a business in North Carolina. Certified vendors are expected to remain informed of legal changes that may affect their obligations.

Failure on the part of the vendor to satisfy any of its requirements and obligations under the laws applicable to this certification program may result in termination of the vendor's application for certification, decertification of its EPB systems if already certified, voidability of contracts with county boards of elections utilizing the vendor's certified products, and may result in legal damages or other liability imposed by law. A vendor whose EPB system has been decertified has an obligation to cooperate in any investigations involving or related to its EPB system that are conducted by the State or County Boards of Elections. This obligation shall remain in effect until all investigations have been concluded. State law makes it a felony to violate certain duties required of an EPB system vendor and imposes additional civil penalties to be assessed by the State Board, in its discretion. N.C.G.S. § 163- 165.9A(b).

2.3. Vendor May Not Sell Uncertified Products

An EPB vendor may not attempt to sell any EPB system in North Carolina that has not been certified by the State Board.

It is the responsibility of both the vendor and a CBE negotiating to purchase an EPB system to ensure that the EPB system that is supplied or purchased for use in North Carolina has been certified by the State Board.

If any question arises involving the certification of an EPB system in use in North Carolina, hardware and software system verification tools may be used to verify that the EPB system in use is in fact identical to the EPB system that has been certified by the State Board.

2.4. Vendor Must Bear Costs

Vendors shall bear all costs associated with necessary certifications, reviews, and reports required under this program, including for independent testing authority review. Questions regarding this requirement and any additional costs associated with certification should be directed to the State Board Voting Technology Certification Manager at the earliest possible point in the certification application process.

2.5. Vendor Must Designate Proprietary Information

In general, documents provided to the State Board and county boards of elections are public record. The State Board, however, must treat proprietary information as confidential and must prevent unauthorized disclosure, provided that the vendor complies with the requirements in N.C.G.S. § 132-1.2(1) to properly indicate the information is proprietary at the time of disclosing that information to the State Board. Nevertheless, the State Board cannot guarantee the extent to which any material provided will be exempt from disclosure pursuant to an investigation, litigation, or other legal requirement.

The vendor or manufacturer must prominently mark any information that it requests be treated as confidential and proprietary as “confidential” or “trade secret” at the time of its initial disclosure to the State Board. It is not sufficient to assert that everything is proprietary. Every page of documentation that contains information the manufacturer considers proprietary information must be clearly marked.

Details about access to information required to be placed in escrow are discussed in Section 2.9 of this document.

2.6. Vendor Must Make EPB Model Available

A vendor seeking certification or operating a certified EPB system within North Carolina must, upon the request of the State Board, make the EPB unit (including hardware, software, firmware, and consumables) available for examination by NCSBE. The unit will be provided at

the vendor's expense, recognizing that NCSBE may inspect and test any equipment seeking certification or in use within North Carolina.

2.7. Vendor Must Provide Training and Assistance During Review

Vendors of certified EPB systems are required to train and support CBE elections personnel and officials on the use of the EPB system, including operational support prior to or during elections, to ensure the proper functioning of the EPB system. Such requirements will be tailored to the individual EPB system during initial certification processes and are a condition of ongoing certification.

The vendor is required to, upon request, assist in the State Board's examination of its certified EPB system to ensure compliance with state and federal legal requirements for EPB systems. This assistance shall include training of and providing support to State Board staff and officials tasked with evaluating and examining the EPB system.

2.8. Vendor Must Provide Information to NCSBE Upon Request

The State Board's general supervisory authority over elections in North Carolina and the rules in the North Carolina Administrative Code establishing certain procedures and standards applicable to the certification of EPBs, as described and explained by the provisions of this program, expressly authorize NCSBE to demand and receive any relevant information, data, or explanation required of any vendor seeking certification or operating within the state.

2.9. Vendor Must Comply with Escrow Requirements

A vendor seeking certification of an EPB that relies on electronic hardware, firmware, or software shall place in escrow with an independent escrow agent approved by the State Board, all items described in G.S. § 163-165.9A(c), required by state law and by this program, accompanied by the sworn affidavit required under G.S. § 163-165.9A(a)(3) and 08 NCAC 04 .0401(d)(2). The approved escrow agent will be identified to the vendor by the State Board Voting Technology Certification Manager.

The documentation to be escrowed includes, but is not limited to, a complete copy of the source and executable code, build scripts, object libraries, application program interfaces, and complete documentation of all aspects of the system. Further, the documentation includes, but is not limited to, compiling instructions, design documentation, technical documentation, user documentation, hardware and software specifications, drawings, records, and data. Additionally, the vendor must provide all instructions, manuals, and resources required by the NCSBE, which are relevant to functionality, setup, configuration, and operation of the EPB

system. Documentation in escrow shall include a list of programmers responsible for creating the software and a sworn affidavit by the chief executive officer of the vendor that the source code includes all relevant program statements in low-level and high-level languages. The chief executive officer must affirm that the source code and other material in escrow is the same being used in its EPB system that is certified for use in this state. The chief executive officer shall ensure that the sworn statement is true on a continuing basis. NCSBE may require that additional items be escrowed. A certified EPB vendor must notify the NCSBE of any change in any item required to be escrowed and must supplement the escrowed item accordingly.

The information required to be placed in escrow is required to be made available for review and examination by only such persons authorized to do so by law. Under N.C.G.S. § 163-165.7(c)(2), this includes the State Board, the North Carolina Department of Information Technology (NCDIT), the State chairs of each political party recognized under N.C.G.S. § 163-96, the purchasing county board of elections, and their designees. Requirements and procedures for persons to be authorized to review and examine the information placed in escrow, as well as the conditions of that access, are provided in 08 NCAC 04 .0308.

The vendor must separately agree with the purchasing county that if the vendor is granted a contract to provide software for an EPB system but fails to debug, modify, repair, or update the software as agreed, or in the event of the vendor having bankruptcy filed for or against it, the source code described in N.C.G.S. § 163-165.9A(a) shall be turned over to the NCSBE, and to the purchasing county by the escrow agent chosen under N.C.G.S. § 163-165.9A(a)(1), for the purposes of continuing use of the software for the period of the contract and for permitting access to the persons described above for the purpose of reviewing the source code.

2.10. Vendor Must Post a Bond or Letter of Credit

For a vendor's certified EPB system to be used in North Carolina, the vendor must post a bond or letter of credit to cover damages resulting from defects in the EPB system, sufficient to cover any costs of conducting a new statewide election attributable to those defects.

NCSBE will survey the county boards of elections in April of every odd-numbered year following the election of the President of the United States, to determine each county's costs for conducting its most recent general election. NCSBE will aggregate those amounts to arrive at the cost of conducting a new statewide election. The aggregate amount will determine the bond or letter of credit requirement, effective June 1 of the year the survey is conducted and will remain in effect until an amount is likewise calculated in subsequent odd-numbered years

following a presidential election. The vendor must contact the State Board Voting Technology Certification Manager to obtain the total cost of conducting a new statewide election.

As part of the application process, the vendor must provide documentation showing, at minimum, preliminary approval of the bond or letter of credit has been secured, even if that approval is conditioned on certification. If the vendor has preliminary approval, then the bond or letter of credit must be finalized upon entering into a contract with a county board of elections for the purchase of the vendor's certified EPB system. The bond or letter of credit must be maintained on a continuous basis, without interruption, as long as the EPB system remains certified and any county board of elections is contracted for use of the EPB system. NCSBE may require assurance at any time that such bond or a letter of credit remains in place.

2.11. Vendor Must Provide a Statewide Uniform Price and Standard Purchase Contract

The vendor must, on a quarterly basis, provide NCSBE a quote for a statewide uniform price for each unit of the EPB system, including peripherals, consumables, and software required for operation of the EPB. The statewide uniform price will be a matter of public record. On a quarterly basis, the vendor must furnish NCSBE with an accounting of purchases of certified EPBs by a jurisdiction within North Carolina. Compliance with the statewide uniform price requirement, as delineated under N.C.G.S. § 163-165.7(c)(3) and 08 NCAC 04 .0401(d), is a condition of ongoing certification.

The vendor must provide NCSBE a copy of its standard purchase contract prepared for use in North Carolina. All contracts between a certified vendor and any elections official, county, or jurisdiction within North Carolina must incorporate by reference this Certification Program. All contracts with a purchasing county must include the following training and support:

- (A) Operational training for a purchasing county's elections personnel;
- (B) Operational support prior to and during any election in which the certified electronic poll book will be in use; and
- (C) End-of-life and end-of-service-life planning for the certified electronic poll book system, including guaranteed support until the system has reached the vendor's stated end-of-life date, optional extended support until the system has reached the end-of-

service-life date, and sanitization of the electronic poll book once it has reached its end-of-service-life.

All contracts with a purchasing county must include an agreement providing that if the vendor fails to debug, modify, repair, or update the software as agreed or files for bankruptcy, the vendor agrees that the escrow agent will turn over source code to the purchasing county.

2.12. Vendor Must Grant State Board Privity of Contract

Notwithstanding any agreement to the contrary, and as a requirement of certification, NCSBE shall have privity of contract in order to enforce the terms of or recover under any contract between a certified vendor and any elections official, county, or governmental unit within North Carolina.

Chapter 3: Certification Review and Approval Process

NCSBE will only consider for certification those EPB systems that are final products that have been used in a full production environment and are available for immediate installation upon certification and procurement.

3.1. Certification Review Process

The certification review process goes through several phases. At the end of each phase, NCSBE will evaluate the results to determine the status of the certification process and notify the vendor of the status.

Phases of EPB Certification Review Process:

1. Letter of application for certification
2. Review of application
3. Independent testing authority review for state compliance
4. Decision by the State Board of Elections

Phase 1: Letter of Application for Certification

The EPB certification process is initiated by the vendor of the EPB system when it sends a letter and accompanying documentation by hard copy or electronically to the Executive Director of the State Board of Elections. The letter should be addressed as follows:

North Carolina State Board of Elections
ATTN: EPB System Certification

Mailing address: P.O. Box 27255, Raleigh, NC 27611

Physical address: 430 N. Salisbury St., Dobbs Building – Third Floor, 6400 Mail Service Center, Raleigh, NC 27603

Electronically: votingsystems.sboe@ncsbe.gov

The letter of application and accompanying documentation must include the following items:

1. **The letter of application** signed by the corporate officer or designee of the vendor. The letter must include the name and contact information of the company and the name and title of the corporate officer signing the application.
2. **The vendor's corporate information** requested by NCSBE. Corporate information includes:
 - a. a history and description of the business, year established, products and services offered, areas served, branch office locations, and subsidiary or parent companies;
 - b. a list of owners or shareholders with a five percent or greater interest or share in each of the vendor's company, subsidiary companies, and parent company;
 - c. a description of management and staff organization, number of full-time employees by category, number of part-time employees by category, and resumes of employees to be tasked with assisting purchasing counties;
 - d. documentation demonstrating that the vendor meets the same level of security compliance required for vendors connected to the State Network, as described in the [NCDIT Statewide Information Security Manual](#);
 - e. a report showing the results of an independent audit of the business for its most current fiscal year;
 - f. a comfort letter from the vendor's primary bank; and,
 - g. a description of the vendor's financial history including a financial statement for the past three fiscal years (if the vendor is not the manufacturer of the equipment for which application is made, the vendor shall include the vendor's financial statement for the past three fiscal years).
3. **Identification of the specific EPB system**, including name and version number, to be evaluated for certification. Each different EPB system or version of an EPB system requires a separate certification application.

4. **A list of all jurisdictions** that have certified, have used, or are currently using the EPB system submitted for certification. The list should also account for any prior submission of the EPB to another jurisdiction for certification.
5. **An attestation** that the corporate officer signing the application has reviewed and confirmed that the EPB meets all legal requirements of EPB systems under state and federal law.
6. **A listing of all software, hardware, and consumables** necessary for operation of the EPB. This includes commercial-off-the-shelf (COTS) items.
7. **A Technical Data Package (TDP).** The TDP is necessary for evaluation of the EPB system submitted for certification. Each item in the package must be clearly identified; if the TDP is incomplete or the items in the package are not clearly identified, the entire package may be returned to the applicant and the evaluation of the EPB system rescheduled. The TDP must contain the following items:
 - a. Hardware Schematic Diagrams
 - b. Hardware Theory of Operations
 - c. Customer Maintenance Documentation
 - d. Operations Manual
 - e. Recommended Use Procedures
 - f. Software License Requirements
 - g. Software Source Code
 - h. Software System Design
 - i. Customer Documentation
 - j. Warranty
 - k. Test Data/Software
 - l. Recommended Security Practices

8. **Documentation of any denial of certification or decertification.** The vendor must identify the decertification of the vendor's EPB or other voting product by any other jurisdiction.
9. **Documentation of any review by an independent testing authority** for compliance with federal or state standards, requirements, or guidance applicable to EPBs.
10. **Standard purchase contract and a statewide uniform price** for each unit of the EPB, including peripherals, consumables, and software required for operation of the electronic poll book.
11. **Documentation of the bond or letter of credit** to cover damages resulting from defects in the electronic poll book.

Phase 2: Review of Application

The Voting Technology Certification Manager or designee will review the letter of application and accompanying documentation and notify the vendor of any deficiencies. The Voting Technology Certification Manager or designee will use the checklist in Appendix C to note whether the application includes the required information and documentation.

The Voting Technology Certification Manager or designee will schedule a demonstration of the EPB system and notify the vendor to submit the following for evaluation:

1. **Production working model of the EPB system** to run through all phases of testing, including:
 - a. All hardware, software, and firmware necessary to run the EPB.
 - b. All commercial-off-the-shelf software and necessary drivers, including the operating system, and any software applications for logging, reporting, and printing. Software shall be provided in a format readable by the EPB hardware that is being submitted for certification.
 - c. All peripheral devices, including those required for usability and accessibility.
 - d. Any other components recommended by the manufacturer for use.

2. **Copy of the test documents** from any prior independent testing authority certification testing, including test plan, test report, test procedures, and test cases.
3. **A release to the independent testing authority** to respond to any requests for information from NCSBE.
4. **A release to other states** which have decertified, or denied certification of, the system or prior versions of the system to respond to any requests for information from NCSBE.
5. **Any other materials and equipment** deemed necessary by NCSBE for its evaluation of the EPB system.

The Voting Technology Certification Manager or designee will conduct a preliminary analysis of the TDP and the EPB system with an independent testing authority. The Voting Technology Certification Manager or designee will also review the corporate information and other materials to evaluate the following:

1. Components of the EPB system to be certified.
2. Financial stability and sustainability of the vendor to maintain product support and fulfill its contractual agreements with county boards of elections for the EPB system.
3. Preliminary analysis of the TDP.

The certification process for the EPB system will not proceed beyond this phase until all required documentation is received and is complete, and the Voting Technology Certification Manager or designee has completed their evaluation of those materials.

Phase 3: Independent Testing Authority Review for State Compliance

NCSBE testing assertions must be evaluated by an independent testing authority.

The independent testing authority will work directly with the vendor to complete all test assertions and test cases and a Certification Test Report will be sent to NCSBE upon completion.

The certification process for the EPB system will not proceed beyond this phase until the test reporting is received.

Phase 4: Decision by the State Board of Elections

Based on the letter of application and accompanying documentation, the Voting Technology Certification Manager's evaluation, the report from the independent testing authority, and other information and materials pertaining to EPBs in its possession, the State Board will decide whether the EPB system will be certified for use in the State of North Carolina. The final decision on certification can only be made by majority vote of the members of the State Board in an open meeting. Documentation of the decision will be provided to the vendor and the county boards of elections and posted on the NCSBE website.

3.2. Incomplete Certification Process

Any certification process that is terminated must be re-initiated from Phase 1 if the vendor again seeks certification of the same EPB system.

NCSBE will terminate the certification process when:

1. **The vendor does not respond within 30 days to a request from NCSBE for information or other resources required to complete the certification process.** If providing the requested information or resources will take more than 30 days, then the vendor must acknowledge the request in writing and provide an estimate as to when the information or resources will be provided.
2. **NCSBE identifies an irreparable deficiency in the EPB system, vendor, or application materials.** A deficiency occurs when the EPB system, vendor, or application does not have a quality or element that is required for certification. This deficiency may be identified through NCSBE or independent testing authority review, and it can include an inability to conduct testing with the equipment provided by the vendor for use in testing. A deficiency will be considered irreparable when the vendor cannot remedy the issue.
3. **The vendor withdraws from the certification process.** A vendor's intent to withdraw should be communicated in writing to the Executive Director of the State Board of Elections in any manner permitted for the submission of the original certification application, as described above.

Chapter 4: Testing Levels; System Elements and Criteria

There are two distinct levels of testing that an EPB system must successfully complete before an EPB system may be certified by the NCSBE. These levels are (1) Federal Compliance Testing, and (2) State Certification Testing. After an EPB System has been certified by the State Board, the system will be subject to Acceptance Testing by a CBE as part of the procurement process.

4.1. Federal Compliance Testing

Federal Compliance Testing demonstrates that an EPB system meets applicable federal requirements for EPBs, including the applicable requirements found in the most current version of the U.S. Election Assistance Commission's [Voluntary Electronic Poll Book Certification Requirements](#) (VEPBCR).

Compliance with those federal requirements, the North Carolina General Statutes and Administrative Code rules applicable to electronic poll books, and the requirements of this Certification Program, must be substantiated by an independent testing authority accredited by or partnered with a federal agency for compliance with applicable law. A vendor may use more than one independent testing authority to demonstrate compliance with federal requirements. Permissible independent testing authorities include:

- A Voting Systems Testing Laboratory (VSTL) recognized by the [National Institute of Standards and Technology \(NIST\)](#);
- The [Center for Internet Security \(CIS\)](#) Rapid Architecture-Based Election Technology Verification (RABET-V) program;
- The [United States Election Assistance Commission \(EAC\)](#) Election Supporting Technology Evaluation Program (ESTEP).

4.2. State Certification Testing

State certification testing will evaluate the design and performance of an EPB system seeking certification to ensure that it complies with all applicable requirements in North Carolina General Statutes and Administrative Codes, and the NCSBE policies referenced in this Certification Program. NCSBE will examine the essential system functions, operational procedures, user guides, documents, certification reports from other states, and reviews from product users.

The EPB system must demonstrate a sufficient level of accuracy, reliability, security, usability and accessibility throughout all testing phases. State Certification Testing will examine, at a minimum, all system operations and procedures identified in Appendix B.

Hardware, Infrastructure, or Component Elements

All equipment used in an EPB system will be examined to determine its suitability for election use, including its durability, transportability, and simplicity in setup and use. Equipment to be tested must be identical in form and function with production units. Engineering or development prototypes are not acceptable.

When the EPB system submitted for certification utilizes vendor-designed software operating on a variety of commercial-off-the-shelf hardware devices, certification will be granted to only similarly identical, and previously designated, hardware and operating systems at the time of certification.

Software Elements

EPB system software, including firmware, will be examined and tested to ensure that it adheres to the performance standards specified within this document. EPB desktop applications must be compatible with all computers, devices, operating systems, and platforms that are specified in the EPB system's stated requirements. See Appendix B for software requirement test assertions.

Security Compliance and Numbered Memoranda

Vendors must meet the requirements for contractors who connect to the State Network, as described in the [NCDIT Statewide Information Security Manual](#).

In addition to security measures required by federal law, state statutes, and administrative codes that are evaluated in testing assertions, NCSBE publishes security requirements by Numbered Memo issued by the Executive Director and approved by the State Board. The security numbered memoranda are applicable to all North Carolina county boards of elections in the use of SEIMS and other technology used to conduct an election, including EPB systems. Therefore, EPB vendors must demonstrate that the EPB system will meet the applicable security requirements identified in numbered memoranda. Vendors should be aware that numbered memoranda, which are accessible via the [NCSBE website](#), may be revised due to legislation, court decision, procedural or technology change/updates. The current security numbered memoranda will be identified to the vendor by the State Board Voting Technology Certification Manager.

4.3. Acceptance Testing

Acceptance Testing ensures that the system delivered to a county board of elections is identical to that which was certified and operates in good working condition. This testing is conducted by the county board of elections with the assistance of state officials or consultants approved by NCSBE. Acceptance testing will be performed as part of the procurement process for the EPB system and will include a presentation of the EPB system by the vendor. A failure to pass acceptance testing may result in an EPB system no longer maintaining its certification status.

The county board of elections will conduct tests to confirm that the purchased or leased system to be installed is identical to the certified system and that the installed equipment and/or software are fully functional and capable of satisfying the administrative and statutory requirements described in this Certification Program. Upon acquiring a certified EPB system, the CBE must send written notification to the State Board, such as sending an email or completing a form provided by the State Board, confirming that the versions of all software and model(s) of equipment received are identical to the certified system that was ordered. See Appendix A for acceptance test details.

Chapter 5: Maintaining Certification, Suspension, Decertification

5.1. Maintaining Certification

Program Oversight

A vendor's marketing and maintenance of its certified EPB system, as well as the performance of the EPB system, is subject to further oversight from NCSBE to ensure the vendor and the EPB system maintain compliance with the legal requirements for EPB systems in North Carolina. This ongoing oversight, however, does not excuse any vendor from the independent duty to comply with all legal requirements pertaining to EPB systems and vendors in North Carolina.

Requirements Upon Certification

1. Provide NCSBE with the current statewide uniform price for each unit of equipment.
2. Provide demonstrations of the certified EPB system to county boards of elections when a county board seeks to purchase a certified EPB system.
3. Place in escrow all required information.
4. Provide a signed, sworn affidavit from the CEO that the source code and other material in escrow is the same as that used in its EPB systems in North Carolina.

Requirements Upon Securing a Contract to Provide an EPB System to a County

1. Immediately post a performance bond or letter of credit.
2. Transmit a copy of the executed purchase contract to the NCSBE Voting Technology Certification Manager.
3. Establish and maintain an office in North Carolina with staff to service the contract.

Select Ongoing Requirements

1. Furnish the State Board on a quarterly basis with copies of sales receipts for all purchases of certified EPB systems and components by any jurisdiction within North Carolina.
2. Notify by email the State Board and purchasing county boards of another United States jurisdiction's decision to decertify or halt the use of the vendor's EPB or other voting product within 24 hours of the jurisdiction's decision.

3. Notify by email the State Board and purchasing county boards of any incident, anomaly, or defect in the same EPB system known to have occurred anywhere, and of any relevant defect known to have occurred in similar systems, within 24 hours of knowledge of the incident, anomaly, or defect.
4. Submit documentation to the Executive Director of the State Board identifying and describing a proposed change to a certified EPB in use in North Carolina.
5. Notify NCSBE of any change in an item required to be held in escrow.
6. Provide, when requested, memory devices or USB drives, sufficient in number to support the operation of the certified EPB in an election setting, that meet industry standards for sanitization and security requirements for cryptographic modules, use cryptographic hashing algorithms of Secure Hash Algorithm 256-bit (SHA-256) or higher, and meet all applicable NCDIT information security standards described in the [NCDIT Statewide Information Security Manual](#).
7. Continue to comply with all federal and state requirements and EPB standards for electronic poll books.
8. Abide by the Voting Systems Vendor Code of Ethics and other rules governing contractors in North Carolina.
9. Make available, upon request and at no cost, a certified EPB model to NCSBE.
10. Maintain the required bond or letter of credit on a continuous basis, without interruption.

5.2 Suspension of Use of EPB System

In the event of a threat to the integrity of an election or the privacy of voter information involving a certified EPB system, the Executive Director of the State Board is required to issue a written order to a county board of elections to suspend the use of that EPB system, or individual unit of that system. Any ordered suspension cannot be greater than one month.

The Executive Director is required to give written notice of the suspension to the electronic poll book vendor within 24 hours of issuing the written order to a county board. The notice will be sent via email and mail to the vendor's corporate officer who signed the certification application or that corporate officer's designee if one has been identified to the State Board for this purpose.

5.3. Decertification of EPB System

The State Board may re-examine any previously certified EPB system for any reason at any time to ensure compliance with state and federal election laws and the certification procedures in this document. Any certified EPB system that does not maintain such compliance will be subject to decertification. An EPB system that has been decertified by the NCSBE cannot be used for elections held in North Carolina and cannot be purchased by county boards of elections to conduct elections.

The final decision on decertification can only be made by majority vote of the members of the State Board in an open meeting. NCSBE may decertify the EPB systems for the following reasons, as provided in 08 NCAC 04 .0402(c):

1. Failure or neglect of an electronic poll book or its vendor to comply with any part of the election laws of the State of North Carolina, including a failure to adhere to and fulfill the requirements of 08 NCAC 04 .0401.
2. Implementation by a vendor of a change to a certified electronic poll book prior to NCSBE review and approval;
3. Failure or neglect of a vendor to update and maintain the operability and security of the electronic poll book;
4. Failure of the electronic poll book to satisfy all the performance standards in examination and testing, or in an election setting;
5. Failure of the vendor to provide electronic notice to NCSBE of an incident, anomaly, or defect affecting the same system known to have occurred anywhere, and of any relevant defect known to have occurred in similar systems, within 24 hours of knowledge of the incident, anomaly, or defect;
6. Failure to report to NCSBE within 30 calendar days any changes to the vendor's corporate information listed in Paragraph 3.1 of this document, including but not limited to:
 - a. The name and contact information of the company and the name and title of the corporate officer on record;
 - b. Branch office locations, and subsidiary or parent companies;

- c. A list of owners or shareholders with a five percent or greater interest or share in each of the vendor's company, subsidiary companies, and parent company;
 - d. A failure to no longer meet security compliance required for vendors connected to the State Network, as described in the [NCDIT Statewide Information Security Manual](#).
7. Reaching end-of-service-life, which means the point in time in which the vendor will no longer provide maintenance or support for the EPB, as provided in the contracts with the county boards of elections in which the product has been procured. The EPB vendor must send an upgrade plan, which may be for modification or new certification, with deliverable date(s) to NCSBE at least 12 months before the end-of-service-life date for a certified EPB that is under use by a county board of election in North Carolina. The EPB system may still be subject to decertification upon reaching its end-of-service-life, even if an upgrade plan has been submitted.

Chapter 6: Minor Changes and Modifications

A vendor must submit for approval by the Executive Director of the State Board of Elections any change to a certified EPB, including changes to its software, firmware, or hardware, prior to implementation in a certified EPB system in use in any North Carolina county. The vendor's proposed change must be communicated in writing by email to the Executive Director and Voting Technology Certification Manager.

If the vendor proposes that the change should be classified as a minor change, then the vendor must identify whether the proposed minor change has been submitted to an independent testing authority accredited by or partnered with a federal agency for review and endorsement, and provide testing documentation from that review, if any.

Following the Executive Director's review, and no matter how the vendor has classified its proposed change, the Executive Director will determine whether the change is a modification or minor change of the certified EPB system.

6.1. Minor Change

If a review by the Executive Director, with the assistance of NCSBE staff, finds the proposed change(s) to be minor, then the Executive Director will consider the application to be an administrative review. If the nature and extent of a proposed minor change cannot be determined, the vendor may be required to obtain review and endorsement by an independent testing authority accredited by or partnered with a federal agency before approving the minor change.

The Executive Director will make a recommendation for administrative approval or disapproval to the members of the State Board of Elections. If no State Board member objects to the recommendation after two calendar days following the transmission of the recommendation, the recommendation will become effective. If a State Board member does object, including an objection to the Executive Director's classification of the change as a minor change, then the State Board must either hear the matter at a meeting of the State Board or call for a full certification review by treating the change as a modification.

6.2. Modification

A modification to an existing EPB system is more significant than a minor change but is not so significant that it has been deemed by an independent testing authority to be a new EPB system version. Any proposed modification to the hardware, firmware, or software of an existing system, which has been initially certified by NCSBE under the procedures described

herein, will act to decertify the system unless the vendor demonstrates to NCSBE's satisfaction that the modification does not and will not compromise the reliability, accuracy, user-friendliness, or secure operation and maintenance of that system.

A modification will result in the EPB system being subject to the full review of its ability to meet the requirements described in this Certification Program. Modifications must be reviewed and evaluated by an independent testing authority to ascertain that the change does not substantiate a new version.

Following evaluation and upon consideration of other supporting information available to it, the State Board of Elections will consider the modification for approval. A certified EPB system may not be modified and used in North Carolina until approved by the State Board of Elections.

Appendix A: Acceptance Test

The acceptance test will demonstrate the delivered EPB system's ability to execute its designed functionality as advertised, tested, and certified by the State Board by demonstrating it can do at least the following:

1. Mark voters as checked in, voted, and given a ballot only after specific actions performed by the authorized user (i.e., poll worker)
2. Provide the user notification and display an appropriate instruction based on the voter status:
 - a. Protected voters
 - b. Inactive voters
 - c. Absentee voters
 - d. Voters out of precinct
 - e. Voters that already voted
3. Perform data and operational integrity safeguard tests including:
 - a. Ability to add or remove new units without disturbing the existing units
 - b. Power supply and battery life with an option to display power usage
 - c. Display an appropriate message when the EPB device is operating at less than 20% of remaining power
 - d. Display an appropriate error message when the EPB fails to check in a voter
4. Produce a Performance Report to include the optimal and average duration of the check-in process per voter
5. Provide system monitoring and notification of system errors, including:
 - a. Perform a self-test for peripheral connectivity
 - b. Visible display indicating power supply/battery life
 - c. Visible display indicating system connections
6. Close the election and provide multiple secure files which are capable of recording voter history in the Voter Registration System
7. Perform data preservation and redundancy to maintain a printable checklist format of the voter registration record and voter activity record on a removable storage
 - a. When one to all of the EPBs become inoperable, and if there is not an alternate recovery means available, then the removable storage must reflect the voter activity record at that moment and can be used to continue with the election

8. Retain all voter activities during an interruption of network connection and synchronize all voter activities upon restoration of connectivity
9. Secure the reliable data transfers and display an appropriate message for each data transfer that is outside of the EPB's closed network, including to an electronic data management system, central server and cloud data service (This is only for testing of EPBs that will be used for Early Voting)
10. Provide Transaction Logging and Audit Reports that can be exported in a readable format, are encrypted, and which include the following details:
 - a. All changes to the EPB system
 - b. Transactions at the polling places
 - c. A date/time stamp
11. Confirm that all modules and data are cryptographic and are FIPS 140-2 compliant including at rest and in transit
12. Comply with the NIST SP 800-63B or better digital identity guidelines for authentication and lifecycle management
13. Support the industry standard for clean wipe method remotely and manually.

Appendix B: Checklist – Legal Requirements, Test Assertions, & Security

Legal Requirements

- ☐ Can record all information a voter is required by law to provide when presenting to vote.
- ☐ Is equipped so that voters and election workers can complete the steps required by law for checking a voter's registration.
- ☐ Is equipped so that voters and election workers can complete the steps required by law for the distribution of ballots to checked-in voters.
- ☐ Is equipped for use for in-person voting during Early Voting and on Election Day.
- ☐ Can contain the list of registered voters eligible to vote in the election.
- ☐ Can verify a voter's eligibility to receive a ballot, by checking the voter's registration and confirming a voter has not previously voted in the election based on available records.
- ☐ Can record a voter's check-in and receipt of a ballot.
- ☐ Logs all user activity in a way where that log is secured from unauthorized alteration and is available only to Authorized Users.
- ☐ Requires the use of individual user accounts assigned to individual Authorized Users and does not allow shared accounts for access to the electronic poll book. Secures the data of the electronic poll book such that the data is stored in a manner that an unauthorized party will not be able to access the data.
- ☐ Does not allow access to confidential voter data, except for official use by Authorized Users.
- ☐ Meets the applicable federal requirements for electronic poll books, including those found in the most current version of the U.S. Election Assistance Commission's Voluntary Electronic Poll Book [Certification Requirements](#) (VEPBCR).
- ☐ Has been reviewed by an independent testing authority accredited by or partnered with a federal agency for compliance with applicable state law.
- ☐ Is compatible with systems, equipment, and software utilized by the State Board and county boards of elections for storing and processing voter registration and voting data.
- ☐ Allows for a wired connection to peripherals approved by the State Board during the certification process that are required for the operation of the EPB system.
- ☐ Allows for a secure network connection for the secure transmission of data with SEIMS, as minimally required for functionality, that is not automatically enabled by default upon powering on or opening the EPB.
- ☐ Does not allow any other forms of connectivity that are not otherwise permitted and required by this certification program and state law.
- ☐ Meets the applicable NC Statewide IT policies and procurement requirements.

Test Assertions

The following test assertions will be executed by the NCSBE-approved Independent Testing Authority.

Machine Setup

- ☐ Show a zero vote count each time first used in an election
- ☐ Accept SEIMS pollbook export
- ☐ Local machine connectivity
- ☐ Remote connectivity disabled
- ☐ Assignment by multiple jurisdictions
- ☐ Assignment by alphabet
- ☐ Password enabled

Voter Lookup and Display

- ☐ Perform voter look-up function by name
- ☐ Perform voter look-up function by date of birth
- ☐ Perform voter look-up function by address
- ☐ Perform voter look-up by voter registration number
- ☐ Perform voter look-up function by driver license number
- ☐ Perform voter look-up function with a wild card feature
- ☐ Perform voter look-up function by residential address
- ☐ Display voter registration name
- ☐ Display voter registration residential address
- ☐ Display voter registration mailing address
- ☐ Display voter registration status
- ☐ Display precinct and VTD assignment
- ☐ Display ballot style assignment
- ☐ Display voter registration number
- ☐ Display registration date
- ☐ Display party affiliation
- ☐ Display gender
- ☐ Display race
- ☐ Display ethnicity
- ☐ Display signature

- ☐ Display date of birth
- ☐ Display age at voting
- ☐ Display removed voters
- ☐ Display related ballot styles
- ☐ Display HAVA ID status/ Identify voters who require identification
- ☐ Display photo-ID pop-up reminder
- ☐ Display eligibility to vote in immediate election
- ☐ Display current election absentee status
- ☐ Display warning for confidential voter

Voter Update

- ☐ Ability to update voter name
- ☐ Ability to update voter residential address
- ☐ Ability to record move date
- ☐ Perform move date validation
- ☐ Ability to assign new precinct and ballot style based on new address
- ☐ Ability to update mailing address
- ☐ Update date of birth disabled
- ☐ Update driver license number disabled
- ☐ Update party affiliation disabled
- ☐ Update gender, race and ethnicity disabled

Voting Methods Supported

- ☐ Select and record in-person voter history
- ☐ Select and record curbside voter history
- ☐ Select and record primary ballot preference (partisan primary only)
- ☐ Select and record Provisional Voting
- ☐ Return of absentee ballot disabled
- ☐ Ability to cancel vote issuance
- ☐ Ability to cancel provisional issuance

Voter Documents

- ☐ Authorization to Vote Document
- ☐ Voter Update Document (name/address only)
- ☐ Provisional Voting Application

- ☐ Precinct Transfer Form
- ☐ Help Referral Form
- ☐ Photo ID Exception Form
- ☐ Provisional Voter Instructions
- ☐ Voter Challenge Form
- ☐ Acknowledgment Notice
- ☐ Ability to reprint ATV
- ☐ Ability to reprint provisional application

Provisional Voting

- ☐ Create a provisional voting application for an existing voter
- ☐ Create a provisional voting application for a new voter
- ☐ Record provisional voter registration application
- ☐ Assign a provisional voting Personal Identification Number (PIN)
- ☐ Assign a provisional poll book number
- ☐ Display and record precinct voted based on voting address
- ☐ Display and record location voted
- ☐ Maintain a provisional voting log and report
- ☐ Ability to print provisional instructions
- ☐ Record appropriate provisional voting reason: ID NOT PROVIDED – NO EXCEPTION FORM/RETURN WITH ID
- ☐ Record appropriate provisional voting reason: ID NOT PROVIDED-EXCEPTION
- ☐ Record appropriate provisional voting reason: ID NOT PROVIDED-EXCEPTION-RELIGIOUS OBJECTION TO BEING PHOTOGRAPHED
- ☐ Record appropriate provisional voting reason: ID NOT PROVIDED-NATURAL DISASTER
- ☐ Record appropriate provisional voting reason: INCORRECT PARTY
- ☐ Record appropriate provisional voting reason: INCORRECT PRECINCT
- ☐ Record appropriate provisional voting reason: JURISDICTION DISPUTE
- ☐ Record appropriate provisional voting reason: NO ACCEPTABLE HAVA ID
- ☐ Record appropriate provisional voting reason: NO RECORD OF REGISTRATION
- ☐ Record appropriate provisional voting reason: NONREASONABLE RESEMBLANCE
- ☐ Record appropriate provisional voting reason: PREVIOUSLY REMOVED
- ☐ Record appropriate provisional voting reason: UNRECOGNIZED ADDRESS (GEOCODE ISSUE)
- ☐ Record appropriate provisional voting reason: UNREPORTED MOVE
- ☐ Record appropriate provisional voting reason: VOTER ALREADY VOTED

- ☐ Record appropriate provisional voting reason: VOTED DURING EXTENDED HOURS
- ☐ Select and record ballot style voted
- ☐ Select and record identification type provided
- ☐ Record Acknowledgment of Voting Options
- ☐ Record Reasonable Impediment option
- ☐ Select curbside provisional option
- ☐ Add Note or Comment to voter record

Audit and Statistics

- ☐ Transaction statistics per machine
- ☐ Transaction statistics per site

Same Day Registration

- ☐ Ability to register and vote new registrants including
- ☐ Ability to input dates of birth
- ☐ Ability to input driver's license
- ☐ Ability to input last four digits of a social security number
- ☐ Ability to input political party
- ☐ Ability to input voter residential address
- ☐ Ability to input mailing address
- ☐ Ability to input demographics (gender, race, and ethnicity)
- ☐ Ability to check U.S. citizenship box
- ☐ Ability to cancel the SDR process
- ☐ Ability to alert that HAVA ID is needed, and which is provided
- ☐ Ability to record proof of residency (HAVA document) provided
- ☐ Ability to indicate that voter does not possess a driver's license/DMV ID or Social Security number

Data Transfer

Ensure Data Integrity of Voter Registration Data from CBE Database to EPB System via Utilization of Secure Removable Storage Device (RSD)

- ☐ Demonstrate that an RSD will remain continuously secure and be free of malware or other harmful data.

- ☐ Import voter registration data to EPB from RSD.
- ☐ Ensure EPB database counts match export file from CBE.

Test EPB for Election-Day Functionality

- ☐ Perform voter lookup.
- ☐ Print ATV label.
- ☐ Maintain record of voter history election data.
- ☐ Has a backup method that ensures recovery in the event of an EPB failure.

Ensure Data Integrity of Post-Election Data Transfer from EPB back to CBE Database via Utilization of Secure RSD

- ☐ Demonstrate that an RSD will remain continuously secure and be free of malware or other harmful data.
- ☐ Export Voter History information to RSD.
- ☐ Export Provisional Data to RSD
- ☐ Export Acknowledgment of Voting Options Data to RSD
- ☐ Ensure RSD voter history data counts match EPB database.

Security

- ☐ Provide role-based access for all users and administrators
- ☐ Meet minimum password requirements based on NCDIT Policies
- ☐ Must have current anti-virus solution installed
- ☐ Must allow for screen locks and timeouts
- ☐ Must not utilize Bluetooth connectivity
- ☐ Must encrypt data at rest that meets NCDIT policy standards
- ☐ Must encrypt data in transit that meets NCDIT policy standards
- ☐ Must meet the applicable security requirements identified in Numbered Memos issued by the Executive Director

Appendix C: Letter of Application Checklist

The company officer or designee submitting the letter of application for certification must include all information and documentation identified in Chapter 3 of this document for the application to be considered complete. The Voting Technology Certification Manager or designee will use this checklist to note that the application includes the required information and documentation:

- ☐ Letter of application
- ☐ Vendor's corporate information
- ☐ Identification of the specific EPB system
- ☐ List of all jurisdictions that have certified, have used, or are currently using the EPB system
- ☐ Attestation of the corporate officer
- ☐ List of all software, hardware, and consumables necessary for operation of the EPB
- ☐ Technical Data Package
- ☐ Documentation of any denial of certification or decertification
- ☐ Documentation of any review by an independent testing authority
- ☐ Standard purchase contract and a statewide uniform price
- ☐ Documentation of the bond or letter of credit

Date Letter of Application Submitted by Vendor: _____

Date Letter of Application Confirmed to be Complete: _____