U.S. ELECTION ASSISTANCE COMMISSION
633 3rd St. NW, Suite 200
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Notice of Clarification

NOC 26-01: End-of-Life Certification Review and Recission Policy

Issued by Program Director on January 28, 2026

Purpose

The U.S. Election Assistance Commission (EAC) administers the federal Voting System Testing and Certification Program, which provides a rigorous, independent process to evaluate compliance with the Voluntary Voting System Guidelines (VVSG). As part of this program, the EAC conducts ongoing post-certification quality monitoring activities to ensure voting systems are deployed as certified, verify the completeness and accuracy of testing, and assess continued compliance with the VVSG. This includes field reviews, anomaly report collection, and manufacturer site audits.

The current certification framework lacks a formal process for managing voting systems that have reached the end of their operational life. Federal certification is open-ended, with no established mechanism for rescinding certification when systems can no longer be supported. To address this gap, the EAC is introducing a new management tool within the Quality Monitoring Program (QMP) to identify, document, and retire systems in a controlled and transparent manner.

Consistent with other electronic systems, voting systems are subject to eventual obsolescence: hardware becomes outdated, software platforms are no longer maintained, and technical support ultimately concludes. As systems age, the absence of manufacturer support or replacement components can compromise sustainment and reduce the ability to maintain compliance with technical requirements. Additionally, once a system is no longer deployed in any jurisdiction conducting federal elections, its continued presence on the EAC's certified list may create ambiguity regarding its suitability and security posture. Establishing a formal mechanism to designate systems that are no longer deployed or supported (end-of-life) ensures that certification records reflect only those systems for which compliance can be meaningfully maintained, while acknowledging that systems certified to earlier versions of the VVSG remain acceptable for use where they are still in operation.

The purpose of this clarification is to enhance the QMP by introducing an end-of-life certification review for certified voting systems. This process enables the EAC to rescind certification when end-of-life criteria are met and incorporates acknowledgment of retirement by jurisdictions and manufacturers as part of the

system's operational conclusion. Together, these steps ensure certification records remain accurate and reflect only systems that can be meaningfully maintained.

Clarification

Manufacturers may request recission of EAC certification when a voting system is no longer supported by the manufacturer and is no longer deployed in any jurisdiction conducting federal elections. Requests must include:

- An attestation confirming both conditions, and
- The system's unique EAC certification ID.

The EAC may also initiate an end-of-life review when QMP data indicates that a system has been retired and is no longer supported. Once end-of-life criteria are determined to be met, certification will be rescinded, and the system will be removed from the active certified list. This action is not punitive; it simply marks the completion of the system's lifespan. Recission does not invalidate prior certification and historical records will remain publicly accessible.

Section(s) of Manual to be Clarified

Testing and Certification Program Manual, version 3.0:

This Notice clarifies the addition of an end-of-life certification review and recission policy to Chapter 8 - Quality Monitoring Program, of the EAC's Testing and Certification Program Manual, Version 3.0.

8.1 Overview

Add:

The Quality Monitoring Program also includes an end-of-life certification review for certified voting systems. This process provides a formal mechanism to identify and retire systems that have reached end-of-life—defined as no longer supported by the manufacturer and no longer deployed in federal elections—through certification recission. This ensures certification records remain accurate and reflect systems that can be meaningfully maintained.

8.1 Purpose

Add:

- maintain the integrity of certification records by identifying and rescinding certification for systems that have reached end-of-life and can no longer be supported.

8.4 Quality Monitoring Methodology

Edit/add:

The EAC utilizes ~~four~~ **five** primary tools…

- monitoring of deployment and support status based on manufacturer disclosures or QMP data.

Add:

8.10 End-of-Life Certification Review and Recission

8.10.1 Purpose

This section establishes a formal process within the Quality Monitoring Program to identify, review, and rescind certification for voting systems that have reached end-of-life. This ensures certification records accurately reflect systems that can be meaningfully maintained and remain compliant with the VVSG.

8.10.2 Criteria for End-of-Life Status
A voting system may be designated as end-of-life when:

- The manufacturer no longer provides technical support, maintenance, or replacement components; and
- The system is no longer deployed in any jurisdiction conducting federal elections.

8.10.3 Initiation of Review
End-of-life certification review may be initiated by:

- <u>Manufacturer Request</u>: Submission of a written attestation confirming both criteria and the system's certification ID.
- <u>EAC-Initiated Review</u>: Initiated only when supported by Quality Monitoring Program data such as manufacturer disclosures, anomaly reports, field review, or audits. An EAC-initiated review is not undertaken without manufacturer involvement except in limited circumstances where the EAC must act on the manufacturer's behalf. This includes cases where the manufacturer is no longer operating in the election technology space or is otherwise unable to participate in the review process.

8.10.4 Review Process

Upon initiation of an end-of-life certification review, the EAC will:

- Verify that established criteria are met, confirming that the system is no longer deployed in federal elections and is no longer supported by the manufacturer.
- Document all findings in the certification record, including the basis for determination and any supporting information from manufacturers or jurisdictions.
- Notify the manufacturer and affected jurisdictions of the determination and provide an opportunity for clarification or correction of deployment or support information prior to final action.

8.10.5 Certification Rescission

When criteria are confirmed:

- The EAC will rescind the system's certification and remove it from the active certified list, reflecting that it is no longer part of the operational program. The system will be removed from the "Certified Systems" page on the EAC website, which provides public visibility into which systems are certified, and placed on a new page labeled "Rescinded Systems."
- Rescission is not punitive and does not imply noncompliance, enforcement action, or deficiency. It simply reflects that the system is no longer deployed or supported and therefore no longer requires ongoing oversight within the program.
- Historical certification records remain publicly accessible, ensuring full transparency regarding past certifications, test campaign results, and documentation, even after a system's certification has been rescinded.
- Recission is not a revocation of the system's original certification.

8.10.6 Effective Date

Certification rescission becomes effective upon publication of the updated certified voting systems list on the EAC's website, including the system's placement on a new page for rescinded voting systems. This publication serves as the official notice to manufacturers, jurisdictions, and the public.

Conclusion

The addition of an end-of-life certification review and rescission policy strengthens the integrity, accuracy, and transparency of the EAC's Testing and Certification Program. By formally identifying and removing systems that are no longer deployed or supported, the EAC ensures that the certified voting systems list reflects only those systems that remain viable within the federal certification framework. This process is administrative in nature and is not punitive; it does not invalidate prior certifications, nor does it imply noncompliance or enforcement concerns. It does, however, acknowledge the natural progression of electronic systems and provides a clear, consistent method for documenting their retirement.

Rescinded systems will be maintained in publicly accessible historical records to preserve the completeness and continuity of the program's certification history. This clarification reinforces the EAC's commitment to transparency, accurate recordkeeping, and the long-term reliability of its certification processes. The updates described in this Notice will be reflected in the next revision of the Testing and Certification Program Manual and will guide the ongoing implementation of end-of-life management within the QMP.