U.S. ELECTION ASSISTANCE COMMISSION
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EAC VVSG Lifecycle Policy Conversation Draft

The EAC is currently drafting a VVSG Lifecycle Policy with a targeted release by Fall 2021, to coincide with the implementation of VVSG 2.0. The intent of this policy is to help facilitate migration to the new VVSG 2.0 standard by providing guidance on deprecation of the obsolete standards, establishing a periodic review and update timeline for new standards going forward, and versioning of future standards.

The proposed changes have the potential to significantly impact the usage of the VVSG and EAC certified voting systems. Your feedback is critical to ensuring the policy is robust and serves its purpose, while simultaneously minimizing any negative impacts. The EAC is committed to doing everything we can to make the transition to the new VVSG as smooth as possible.

The following core aspects of the VVSG Lifecycle Policy are being presented to generate discussion and solicit feedback on some of the potential methods of implementation for each area. Please provide feedback or comments on the numbered options in each section.

VVSG Standard Deprecation

Reducing or eliminating the certification of voting systems to obsolete standards (VVSG 1.0 and 1.1) is a key element in the transition to 2.0. Currently, manufacturers may certify modifications to existing VVSG 1.0 certified systems without significant bounds around what constitutes a modification vs. a new system. Manufacturers submitting new systems must submit to the most recently implemented VVSG version, which is currently VVSG 1.1. We need to move adoption of VVSG 2.0 forward while not stranding users of VVSG 1.0 certified systems from not being able to receive critical updates. We are looking for the most efficient and least impactful solution.

Please provide feedback on the following potential approaches:

1. Allow modifications to currently certified systems indefinitely with a narrowed definition of what is allowed in a modification. The proposed narrowing would exclude the addition of new system components and would resemble the current de minimis change process but allow for additional testing.

2.   Allow modifications to currently certified systems indefinitely with no changes to the definition of a modification. This could include a requirement added to the Testing and Certification program manual that would prevent manufacturers from marketing VVSG 1.0 systems as "EAC certified" to new customers 24 months after implementation of VVSG 2.0. We propose that the meaning of "new customer" be analogous to "new implementation" but may need calibration to account for state certification and/or statewide implementations that may be in-progress.

3. Implement deprecation of the obsolete standards approximately 12 months after certification of the first voting system to VVSG 2.0. Modifications to voting systems certified under the obsolete standards would not be allowed; only de minimis changes could be applied.

4. Implement deprecation of obsolete standards approximately 24 months after at least one VSTL is accredited to test against VVSG 2.0. Modifications to voting systems certified under the obsolete standards would not be allowed; only de minimis changes could be applied.

VVSG Update Cadence

Regular updates to the VVSG are essential to ensuring that the standard remains agile and responsive to the needs of acquiring jurisdictions and a continuously evolving technology and legal environment. A regular update cycle will reduce the overhead involved in proposing, reviewing, and approving minor changes to the VVSG. The overall number of changes should be smaller and should not generate as many comments. The program manuals and other program policy documents will not necessarily follow the same cadence.

Updates to the standard during this regular cycle may incorporate items such as requests for interpretation, notices of clarification, errata, and other administrative changes. Additionally, requirements may be added or adjusted to address accessibility concerns, updates to common data formats to support more voting system functions, security updates to patch vulnerabilities, or other updates to accommodate new technologies or standards.

Please provide feedback on an update period that balances agility without being overly burdensome. The EAC proposes:

1. An 18-month update cycle; or
2. A 24-month update cycle.

VVSG Configuration Management – Version vs. Revision

The VVSG update cadence is meant to update the standard more frequently than in the past, while maintaining backwards compatibility between major updates. As a result, there will be implications for states that specify a particular version of VVSG in their certification rules, or that only the "latest version" of the VVSG be allowed for certification.

When backwards compatibility is unable to be maintained (e.g., requirements are modified or added that make current equipment, software, or testing obsolete), the major version will be updated to VVSG 3.0, VVSG 4.0, etc.

Please provide feedback on which of the following versioning schemas allow states the greatest flexibility:

1. Utilizing a minor version: VVSG 2.0, 2.1, 2.2, etc.
2. Utilizing a revision: VVSG 2.0 revision 1, revision 2, etc.
3. Utilizing a date style revision: VVSG 2.0 version 2021, version 2022, etc.