



Good morning Chairman Clay, Ranking Member Turner, and Members of the Subcommittee. I am pleased to be here this morning on behalf of the U.S. Election Assistance Commission (EAC) to discuss the changes in voting system requirements that have been effectuated by the Help America Vote Act of 2002 (HAVA) and the role that EAC plays in supporting the States and local governments in implementing HAVA-compliant voting systems.

INTRODUCTION

EAC is a bipartisan commission consisting of four members: [Donetta Davidson](#), Chair; Rosemary Rodriguez, Vice Chair; [Gracia Hillman](#); and Caroline Hunter. EAC's mission is to guide, assist, and direct the effective administration of Federal elections through funding, innovation, guidance, information and regulation. In doing so, EAC has focused on fulfilling its obligations under HAVA and the National Voter Registration Act (NVRA). EAC has employed four strategic objectives to meet these statutory requirements: Distribution and Management of HAVA Funds, Aiding in the Improvement of Voting Systems, National Clearinghouse of Election Information, and Guidance and Information to the States. The topic of this hearing involves our strategic efforts to aid in the improvement of voting systems and to provide guidance and information to States to assist in improving the voting process. These programs and EAC's efforts to assist States with implementing voting systems and procedures to safeguard those systems will be discussed in more detail below.

VOTING SYSTEMS

Effective administration of voting systems requires the use of accurate, reliable, accessible and auditable voting systems. There are various opinions on what constitutes accurate, reliable, accessible and auditable, but one clear source is the Help America Vote Act of 2002 (HAVA). HAVA establishes a number of requirements for voting systems, including that the system:

- Allow the voter the ability to change his or her selections prior to casting a vote;
- Notify the voter of an overvote and the consequences of casting an overvote;
- Provide a permanent paper record of the election that is auditable;
- Provide accessibility to individuals with disabilities including persons who are blind or visually impaired;
- Provide accessibility to persons for whom English is not their first language when required by Section 203 of the Voting Rights Act; and
- Meet or exceed the error rate as established in the 2002 Voting System Standards developed by the Federal Election Commission.

See HAVA Section 301; 42 U.S.C. Section 15481. This section requires that all voting systems used in an election for Federal office meet or exceed these requirements. States



could use HAVA funding to purchase voting systems that meet or exceed these requirements. A [chart](#) showing the funds distributed to each State is found on EAC's Web site, www.eac.gov.

In addition, HAVA also required EAC to develop guidelines for testing voting systems and required EAC to establish a program for the testing of voting systems using federally accredited laboratories. These guidelines and testing and accreditation processes establish a means to determine whether voting systems meet the base-line requirements of HAVA and the more descriptive and demanding standards of the voluntary voting system guidelines developed by EAC. This process provides assurance to election officials and members of the public that the voting systems that they use will perform in a manner that is accurate, reliable, accessible and auditable.

Voluntary Voting System Guidelines (VVSG)

One of EAC's most important mandates is the testing, certification, decertification and recertification of voting system hardware and software. Fundamental to implementing this key function is the development of updated voting system guidelines, which prescribe the technical requirements for voting system performance and identify testing protocols to determine how well systems meet these requirements. EAC along with its Federal advisory committee, the Technical Guidelines Development Committee (TGDC), and the National Institute of Standards and Technology (NIST), work together to develop voluntary testing standards.

History of Voting System Standards and Guidelines

The first set of national voting system standards (VSS) was created in 1990 by the Federal Election Commission (FEC). In 2002, FEC updated the standards and HAVA mandated that EAC develop a new iteration of the standards—which would be known as the Voluntary Voting System Guidelines (VVSG)—to address advancements in information security and computer technologies as well as improve usability.

HAVA mandated a 9-month period for the TGDC to develop the initial set of VVSG. The TGDC, working with NIST, technology experts, accessibility experts, and election officials, completed the first draft and delivered it to EAC in May 2005. In addition to providing technical support to the TGDC, NIST also reviewed the 2002 Voting System Standards (2002 VSS) to identify issues to be addressed in the 2005 guidelines, drafted core functional requirements, categorized requirements into related groups of functionality, identified security gaps, provided recommendations for implementing a voter-verifiable paper audit trail, and provided usability requirements. NIST also updated the VVSG's conformance clause and glossary.

On December 13, 2005, EAC adopted the first iteration of the [Voluntary Voting System](#)



[Standards \(VVSG\)](#). Before the adoption of the VVSG, EAC conducted a thorough and transparent public comment process. After conducting an initial review of the draft VVSG, EAC released the two-volume proposed guidelines for public comment for a period of 90 days; during this period, EAC received more than 6,000 comments. Each comment was reviewed and considered before the document was finalized and adopted. The agency also held public hearings about the VVSG in New York City, NY, Pasadena, CA, and Denver, CO.

The VVSG was an initial update to the 2002 Voting System Standards focusing primarily on improving the standards for accessibility, usability and security. The VVSG also establishes the testing methods for assessing whether a voting system meets the guidelines. In many areas, these guidelines provide more information and guidance than HAVA. For example, these testing guidelines incorporated standards for reviewing voting systems equipped with voter verifiable paper audit trails (VVPAT) in recognition of the many States that now require this technology. Likewise, in the area of accessibility, the guidelines require that if the VVPAT is used as the official ballot, the paper record be made accessible to persons with disabilities, including persons with visual impairments or disabilities. Volume I of the VVSG, *Voting System Performance Guidelines*, includes new voluntary requirements for accessibility, usability, voting system software distribution, system setup validation, and wireless communications. It provides an overview of the voluntary requirements for independent verification systems, including voluntary requirements for a voter-verified paper audit trail for States that require this feature for their voting systems. Volume I also includes the requirement that all voting system vendors submit software to a national repository, which will allow local election officials to make sure the voting system software that they purchase is the same software that was certified.

Volume II of the VVSG, *National Certification Testing Guidelines*, describes the components of the national certification testing process for voting systems, which will be performed by independent voting system test labs accredited by EAC. EAC is mandated by HAVA to develop a national program to accredit test laboratories and certify, decertify, and recertify voting systems. The VVSG and the comments received from the public about the guidelines are available at www.eac.gov.

The Future of the Voluntary Voting System Guidelines

Significant work remains to be done to fully develop a comprehensive set of guidelines and testing methods for assessing voting systems and to ensure that they keep pace with technological advances. TGDC and NIST have been working since the development of the initial iteration of the VVSG in 2005 to revise that version and to completely review and update the 2002 Voting System Standards that were developed by the FEC. The next iteration of the VVSG, which EAC anticipates receiving from TGDC sometime later this year, will include the following elements:



- Software independence – use of verifiable voting records for independent audits;
- Prohibition of RF wireless;
- A process to include new and innovative voting systems with greater usability, accessibility, and security;
- Improved methods for measuring reliability and accuracy of voting systems;
- Improved and updated usability and accessibility requirements;
- Improved requirements for the overall reliability of voter verifiable paper audit trail voting systems.

In addition to this work, NIST is working to develop a uniform set of test methods that can be applied to the testing of voting equipment. Currently, accredited laboratories develop their own test methods to test voting equipment. After the completion of these uniform test methods, every accredited lab will use the same test to determine if a voting system conforms to the VVSG. This is a long and arduous process as test methods must be developed for each type and make of voting system. Work is beginning in 2007 on these methods, but will likely take several years to complete.

Voting system testing and certification and laboratory accreditation program

Accreditation of Voting System Testing Laboratories

HAVA Section 231 requires EAC and NIST to develop a national program for accrediting voting system testing laboratories. The National Voluntary Laboratory Accreditation Program (NVLAP) of NIST provides for the initial screening and evaluation of testing laboratories and will perform periodic re-evaluation to verify that the labs continue to meet the accreditation criteria. When NIST has determined that a lab is competent to test systems, the NIST director recommends to EAC that a lab be accredited. EAC then makes the determination to accredit the lab. EAC issues an accreditation certificate to approved labs, maintains a register of accredited labs and posts this information on its Web site.

HAVA required that NIST deliver its first set of recommended labs to the EAC “[n]ot later than 6 months after the Commission first adopts the voluntary voting system guidelines.” See HAVA Section 231(b), 42 U.S.C. 15371(b). This deadline passed in June 2006. Four laboratories applied to NIST for evaluation prior to the HAVA deadline, but the required technical reviews and on-site assessments were not completed by the deadline. The first set of NIST recommended laboratories were not received by the EAC until January 18, 2007. EAC conducted additional review of the laboratories’ conflict of interest policies, organizational structure, and record keeping protocols. This review was



conducted efficiently, so that EAC could move forward with accrediting the first voting system testing laboratories under its new program. The first two laboratories were accredited by EAC at its [public meeting](#) on February 21, 2007. These two labs are now accredited to test to the 2005 VSS.

The Need for EAC Interim Accreditation of Laboratories

Obviously, the need for EAC to provide accredited laboratories arose well before NIST's January 18 recommendation. First, toward the end of 2005, NIST informed the EAC that the expected timeline to complete required document collection and review, pre-assessment and formal on-site assessments of applicants made it highly unlikely that it would be able to provide a list of recommended laboratories before the end of 2006. This determination made it clear that the EAC would need to have an alternative, temporary process in place to provide accredited laboratories if it wished to implement its certification program in time for the 2006 election. Furthermore, in July of 2006, the National Association of State Election Directors (NASED) informed EAC that the organization was terminating its voting system qualification program. NASED is a non-governmental, private organization that accredited laboratories and qualified voting systems to federal standards for more than a decade. The organization's decision to terminate its voting system qualification program just before the 2006 general election required EAC to take immediate action. Without an entity to approve required voting system modifications for the 2006 election, some state election officials would be unable to field their HAVA-compliant systems. To address these situations, EAC was compelled to do two things (1) provide for interim, temporary accreditation of testing laboratories to test to the 2002 VSS and (2) initiate a preliminary, pre-election phase of its voting system testing and certification program.¹

EAC needed to provide 2002 VSS-accredited labs on a temporary, interim basis to ensure that the agency had the means to implement its certification program. Additionally, EAC would be compelled to implement a provisional, pre-election certification program to

¹ The pre-election phase of EAC's certification program was not originally planned, but was ultimately required to serve election officials and the public. The program began on July 24, 2006. The purpose of the pre-election phase of the program is to provide voting system manufacturers with a means to obtain a Federal Certification of voting system modifications during the vital period immediately prior to the November 2006 General Elections. Many states require a Federal or national certification as a condition of state certification. Historically, the three to four month period immediately preceding a General Election produces a number of emergent situations that require the prompt modification of voting systems. These changes are often required by state or local election officials and must be made prior to Election Day. To this end, the pre-election phase of the EAC's Certification Program was designed to meet the immediate needs of election officials from the date NASED terminated its qualification program until after the November 2006 General Election. The pre-election requirements of the certification program were narrowly tailored to meet these needs. Additionally, the pre-election phase of the program was drastically limited in scope, (1) it did not certify voting systems, just modifications and (2) the certification was provisional and, thus, expired after the November 2006 election.



replace services offered by NASED. EAC could not wait for NIST to recommend laboratories. Fortunately, HAVA provided a mechanism for EAC to take such action in Section 231(b)(2)(B). This section requires that EAC publish an explanation when accrediting a laboratory without a NIST recommendation. A notice was published on EAC's Web site (www.eac.gov) to satisfy this requirement.

EAC's Interim Accreditation Program

At a [public meeting in August 2005](#) held in Denver, the commissioners received a staff recommendation outlining the details of the interim accreditation program. The staff recommendation included a process in which the three laboratories previously accredited by NASED – CIBER, SysTest Labs, and Wyle Laboratories – would be allowed to apply for interim accreditation. In December of 2005, EAC officially began accepting applications for a limited interim accreditation program. As stated in the letters, the purpose of the interim accreditation program was to provide accredited laboratories that could test voting systems to federal standards, until such time as NIST/NVLAP was able to present its first set of recommended laboratories. This accreditation was limited in scope to the 2002 Voluntary Voting System Standards and required the laboratory to apply to the NVLAP program with the intent to receive a permanent accreditation. The letters also sought variety of administrative information from the laboratories and required them to sign a Certification of Laboratory Conditions and Practices. This certification required the laboratories to affirm, under penalty of law, information regarding laboratory personnel, conflict of interest policies, recordkeeping, financial stability, technical capabilities, contractors, and material changes.

In order to accredit a laboratory, even on an interim basis, EAC needed to contract with a competent technical expert to serve as a laboratory assessor. EAC sought a qualified assessor with real-world experience in the testing of voting systems. The contractor reviewed each of the laboratories that applied. The review was performed in accordance with international standards, the same standards used by NVLAP and other laboratory accreditation bodies. This standard is known as International Standard ISO/IEC 17025, *General Requirements for the Competence of Testing and Calibration Laboratories*. In addition, the EAC assessor (who also currently serves as a NVLAP assessor) applied NIST Handbooks 150, *Procedures and General Requirements* and NIST Handbook 150-22, *Voting System Testing*.

CIBER, SysTest Labs, and Wyle Laboratories applied for accreditation under the interim program. Each, as required, had previously received a NASED accreditation. EAC's assessor visited each of the labs and conducted a review consistent with the standards noted above. The assessor reviewed laboratory policies, procedures and capabilities to determine if the laboratories could perform the work required. Laboratory assessments do not make conclusions regarding past laboratory work product. Two of the applicant laboratories, SysTest Laboratories, L.L.C., and Wyle Laboratories, Inc. received an



interim accreditation. The assessor's reports and EAC action regarding these laboratories are available on the EAC Web site, www.eac.gov.² EAC promptly published on its Web site information regarding its decision on accreditation (August and September of 2006). This notice provides some brief background on the interim accreditation process, starting with the fact that three previously NASED accredited laboratories were invited to apply to the program, including information on the program's requirements and limitations, and ending with the identity and contact information of the two laboratories accredited. Information was also electronically forwarded to EAC's list of stakeholders via e-mail. The EAC stakeholders e-mail list includes almost 900 election officials and interest groups, nationwide. Staff members for EAC oversight and appropriations committees are included in this list of stakeholders. In addition to EAC's Web site and e-mail announcements, on September 21, 2006 EAC's Executive Director reiterated the Commission's decision at a public meeting Web cast to the EAC Web site. This announcement identified the interim accredited labs by name. Furthermore, in October 26, 2006, the two interim accredited laboratories testified at EAC's nationally televised public meeting.

The Interim Accreditation Program and CIBER

The third laboratory, CIBER, has yet to satisfy the requirements of the interim accreditation program. The initial assessment of CIBER revealed a number of management, procedural and policy deficiencies that required remedial action before the laboratory could be considered for accreditation. These deficiencies are identified in the initial CIBER/Wyle report. They were also brought to the attention of CIBER's President of Federal Solutions in a letter from EAC's Executive Director dated September 15, 2006. The letter outlines, consistent with recommendation of EAC's assessor, the steps the laboratory must take to achieve compliance. The letter requires CIBER to:

- a. Assign resources, adopt policies and implement systems for developing standardized tests to be used in evaluating the functionality of voting systems and voting system software. Neither ITA Practices, CIBER nor any of its partners will be permitted to rely on test plans suggested by a voting system manufacturer.*
- b. Assign resources, adopt policies and implement systems for quality review and control of all tests performed on voting systems and the report of results from those tests. This shall include provisions to assure that all required tests have been performed by ITA Practices, CIBER or its accredited partner lab.*

² Note: The Wyle and CIBER assessments were completed as a joint report. The two labs have a cooperative agreement to work together in testing voting systems (Wyle performing hardware testing and CIBER software testing).



Finally, the letter required an additional “follow-up” assessment of the laboratory.

The follow-up assessment of CIBER was performed by EAC’s assessor in December of 2006. The findings of this assessment were documented in a report, which is available on the EAC Web site. In the findings, the assessor recognized significant changes CIBER had made to its program in response to the initial assessment, including new policies regarding test procedures, management and personnel. The report also noted a number of non-conformities that had yet to be addressed by the laboratory.

In a letter dated January 3, 2007, CIBER provided a written response to EAC’s follow-up assessment and report. The response sought to address the deficiencies noted in the December assessment. Additionally, CIBER officials requested a meeting with EAC staff to discuss their January 3 response. This meeting took place at EAC on January 10, 2007. At the meeting, EAC staff informed CIBER that their report could not serve as the basis of accreditation because it failed to resolve all outstanding issues. A number of CIBER responses to noted deficiencies were listed as “TBD.” EAC’s assessor and Certification Program Director formally reviewed CIBER’s response. EAC provided CIBER notice of the deficiencies that remained outstanding and informed them of the steps they must take to come into compliance by a letter dated February 1, 2007. Due to the fact that the purpose and usefulness of the interim accreditation program came to a close, EAC allowed CIBER 30 days in which to document their full compliance. After that time, the program was closed and no further assessment actions will be performed under the interim program. CIBER was notified of this procedure by letter dated January 26, 2007, and on February 8, 2007, EAC voted to close its interim laboratory accreditation program effective March 5, 2007.

Information related to CIBER’s status in the EAC interim accreditation program was not released prior to January 26, 2007. It was EAC’s belief, consistent with NVLAP policy, that it would be improper to release information regarding an incomplete assessment. However, on January 25, 2007, CIBER took the affirmative action of making this information available to a third party, the New York State Board of Elections. With this action, CIBER made the information public and EAC believed it was incumbent to provide this information to the entire public, not just the New York State Board of Elections. As such, on January 26, 2007, EAC posted on its Web site (www.eac.gov) assessment reports, correspondence, and responses from CIBER related to their progress in the EAC interim accreditation program.

Since that time, EAC has received an additional response from CIBER. That response is currently being reviewed by our assessor. Based upon the assessor’s recommendation, EAC will act to accredit or to decline to accredit CIBER to test to the 2002 VSS under EAC’s interim laboratory accreditation program. It is important to note, however, that this action, even if it results in accrediting CIBER to the 2002 VSS, **will not**



automatically make CIBER eligible to test to the 2005 VVSG. CIBER's application for 2005 VVSG accreditation is pending before NVLAP. Until EAC receives a recommendation from NVLAP that CIBER should be accredited to the 2005 VVSG, CIBER **will not** be accredited to test to those standards and will not therefore possess the accreditation desired by New York to test voting systems for their purchase. New York law requires that voting systems purchase in that state are tested to the 2005 VVSG. As noted above, there are currently two laboratories accredited under the joint NVLAP/EAC program that are qualified to test to the 2005 VVSG.

Voting System Certification

In 2007, EAC assumed the responsibility of certifying voting systems according to national testing guidelines. Previously, the National Association of State Election Directors (NASED) qualified voting systems to both the 1990 and 2002 Voting System Standards. EAC's certification process constitutes the Federal government's first efforts to standardize the voting system industry.

In July 2006, EAC implemented its pre-election certification program, which only focused on reviewing changes or modifications that were necessary for modifications to systems that would be used during the November 2006 elections. Three modifications were reviewed and approved under the pre-election program. Those modifications were approved only conditionally. The condition was that the authorization for the modification expired after the 2006 election. After that, no modification will be considered unless the entire system has already received an EAC certification.

In October 2006, EAC published for public comment its post-election certification program. This program encompasses an expanded and detailed review of voting systems, utilizing accredited laboratories and technical reviewers. EAC received over 400 comments during the public comment period. At a public meeting on December 7, 2006, EAC adopted its Voting System Certification Program, which became effective on January 1, 2007. Since that time, nine manufacturers have registered to participate in the EAC program. The registration process is antecedent and required prior to a manufacturer submitting a system for testing. Currently, nine manufacturers are registered with EAC. A list of registered manufacturers is available at www.eac.gov.

Once the manufacturer is registered, it may submit systems for testing to an EAC-accredited testing laboratory. Reports from that laboratory's assessment are provided to EAC for review and action. The reports are reviewed by EAC technical reviewers. If the report is in order and the system is in conformance with the applicable voting system standards or guidelines, the technical reviewers will recommend that EAC grant the system certification. EAC's executive director will consider the recommendation and make the final decision regarding certification. Once certified, a system may bear an EAC certification sticker and may be marketed as having obtained EAC certification.



The EAC's certification process includes assessment of quality control, field monitoring, decertification of voting systems, and enhanced public access to certification information. For more information concerning EAC's Voting System Testing and Certification Program, see the [program manual](#) for this program, which is available on the EAC Web site, www.eac.gov.

Federal Process Adds Transparency and Accountability

The implementation of EAC's Laboratory Accreditation Program and Voting System Testing and Certification Program mark the first time that the Federal government has funded and tested both laboratories and voting systems. Both of these processes were previously conducted by NASED in a collaborative and voluntary effort. The Federal government's involvement in these processes will shed light on the rigorous process that ensures that our nation's voting systems are accurate, reliable and ready for service in any election. Unlike our predecessors, EAC is obligated to conduct accreditation and certification processes that are open and that share information about the results of those tests with the public. EAC has developed its programs with the knowledge that public confidence is critical to the election process and that public confidence comes from public knowledge and understanding of the process. Information about EAC accredited laboratories is available on EAC's Web site, www.eac.gov. Similarly, information about EAC's testing and certification program and any systems that have been tested through that program also will be available on the EAC Web site.

THE VOTING PROCESS

Once a State or local election jurisdiction has purchased a new voting system, there is still a great deal of work to be done to assure that elections are conducted properly. Purchasing the right system is in many ways the easy part. Using it properly takes time, planning, and persistent attention to detail.

Election officials must keep in mind that in order to successfully compromise a voting system during an election, a person must have knowledge of the system and access to the system while the election is taking place – a scenario that applies to ballot boxes or e-voting machines. Any discussion or policy about implementing a secure voting system must examine all aspects of the voting process. The bottom line is that real security for any type of voting system – electronic or paper-based – comes from systematic preparation. State officials should ensure that they:

- Prepare systems to prevent tampering;
- Prepare people to detect tampering;
- Prepare poll workers and law enforcement to react to tampering; and
- Prepare election officials to recover by auditing and investigating tampering.



These fundamental election administration processes to protect the entire voting process will always be important, even as voting technology evolves. Focusing solely on the reliability of voting systems is not enough, and a Federal certification for the system cannot take the place of solid, thorough management procedures at the State and local levels to ensure the system is managed, tested, and operated properly. Achieving accurate and reliable election results will always be the combination of thorough testing of the equipment, training and resources for election officials and poll workers, and through election management guidelines for every aspect of election administration.

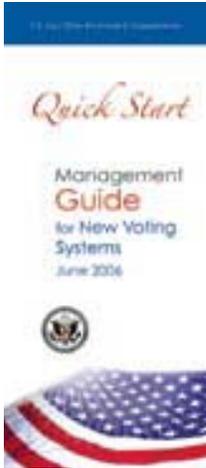
Management Guidelines

EAC is working to assist States and local election jurisdictions with identifying and managing all of the details surrounding the successful administration of elections. In 2005, EAC began work on a comprehensive set of management guidelines, collaborating with a group of experienced State and local election officials to provide subject matter expertise and to help develop the guidelines. The project focuses on developing procedures related to the use of voting equipment and procedures for all other aspects of the election administration process. These publications are intended to be a companion to the VVSG and assist States and local election jurisdictions with the appropriate implementation and management of their voting systems. The first set of election management guidelines will be completed in FY 2007; they will be available to all election officials to incorporate these procedures at the State and local levels.

Four *Quick Start Guides* were distributed to election officials prior to the 2006 election. These guides are summaries of more extensive chapters of the Management Guidelines that will be released this year. The guides were sent to election officials throughout the nation and covered topics such as introducing a new voting system, ballot preparation, voting system security, and poll worker training. All *Quick Start* guides are available at www.eac.gov. A brief description of each *Quick Start* guide is provided below.

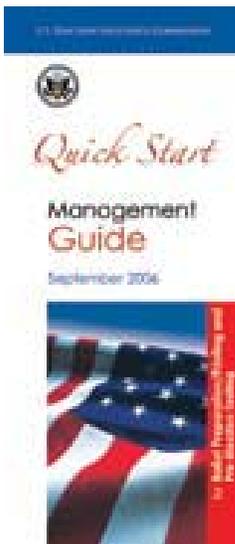


Quick Start Guide for New Voting Systems



The guide provides a snapshot of processes and procedures election officials should use when introducing a new voting system. It covers receiving and testing of equipment; implementation tips, such as conducting a mock election and developing contingency plans; and programming. The guide also offers Election Day management strategies, including opening the polls, processing voters, and closing the polls.

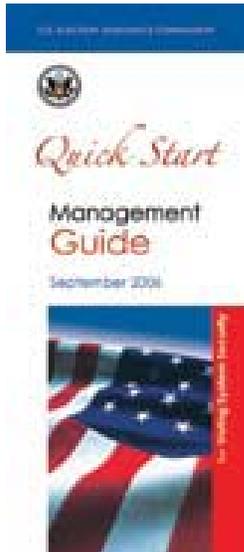
Quick Start Guide for Ballot Preparation/ Printing and Pre-Election Testing



Ballot preparation and logic and accuracy testing are essential steps to ensure Election Day runs smoothly. The guide offers tips on preparing and printing ballots, which includes confirming that ballots conform to all applicable State laws as well as requiring a multilayered ballot proofing process at each stage of the design and production process. The guide also covers pre-election testing for hardware and software logic and accuracy.

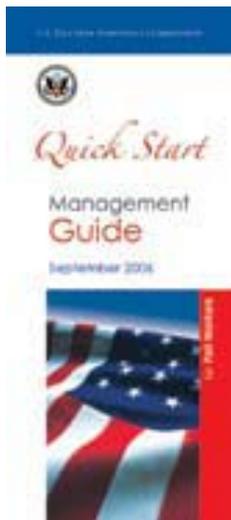


Quick Start Guide for Voting System Security



The introduction of new equipment also ushered in concerns regarding voting system security. To address some of those concerns and to help election officials implement effective management procedures, the guide highlights priority items essential to securing these systems. It addresses software security, advising officials to be sure that the software installed on the systems is the exact version that has been certified. The guide advises officials to not install any software other than the voting system software on the vote tabulating computer; to verify that the voting system is not connected to any network outside the control of the election office; and to consider any results transmitted electronically to be unofficial and verify them against results contained on the media that are physically transported to the central office. Also included in the guide are recommendations regarding password maintenance, physical security, personnel security, and procedures to secure the equipment.

Quick Start Guide for Poll Workers



One of the most challenging tasks for election officials is recruiting and training poll workers. The guide contains information about identifying potential poll workers, effective training programs and techniques, as well as procedures to implement on Election Day.

A full range of Management Guideline documents will be developed to cover topics related to election administration, including:

- Pre-Election Testing



- Ballot Design
- Contingency/Disaster Planning
- Vote by Mail/Absentee Voting
- Military/Overseas Voting
- Polling Place/Vote Center Management

In addition, new *Quick Start* guides are planned for 2007, including guides on the following topics:

- Change Management
- Public Relations
- Contingency/Disaster Planning
- Certification
- Developing an Audit Trail

Proper management of elections is key to conducting a reliable, accurate, open and accessible election. Buying state of the art voting equipment with the latest security features is meaningless unless the door to the storehouse where the voting systems are kept is secured and locked. Similarly, equipment used to program voting systems should never be connected to the Internet. It is EAC's goal to communicate these suggestions and requirements to the election officials to help them increase the security and accuracy of their voting equipment by their practices and procedures.

CONCLUSION

Elections are a complex equation of people, equipment and processes. All three pieces work together to ensure a successful, accurate and reliable election. HAVA was careful to address them all. And, EAC is working diligently to provide States with the tools that they need to purchase accurate and reliable voting systems, to implement those systems in a secure environment, and to assure that election officials, poll workers and voters are trained on how to use the voting equipment accurately and effectively.

EAC appreciates the opportunity to provide this testimony. If you have any questions, I will be happy to address them.