



**Testimony  
Before the U.S. Election Assistance Commission**

**Pro V&V Lab Accreditation Recommendation**

**Public Meeting February 24, 2015**

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On February 2, 2012, Pro V&V received a formal letter of invitation from the U.S. Election Assistance Commission (EAC) as the initial step towards becoming a Voting System Test Laboratory (VSTL) under the provisions of §231 of the Help America Vote Act (HAVA) of 2002.

After the requisite laboratory audit from the National Voluntary Laboratory Accreditation Program (NVLAP) at the National Institute of Standards and Technology (NIST), the EAC received a letter from NIST Director Dr. Patrick Gallagher indicating successful completion of the technical review process for Pro V&V and including a proposal that the EAC accredit Pro V&V as a VSTL under the provisions of HAVA. This letter was dated August 2, 2012.

On September 27, 2012, I sent a letter to Pro V&V lab Director Mr. Jack Cobb noting that the EAC had received the recommendation from the NIST Director and that on April 9, 2012, the EAC received responses from Pro V&V adequately addressing the three nonconformities and two comments noted during the EAC laboratory audit of Pro V&V conducted on February 24, 2012 and noted in our Voting System Test Laboratory Initial Assessment Report dated March 21, 2012. The letter went on to state that Pro V&V had met all procedural requirements of both NIST and the EAC Voting System Test Laboratory Program in order to be accredited as an EAC VSTL, but because the EAC at that time lacked a quorum of Commissioners to vote on the accreditation, the EAC would hold all documentation in readiness and present their material for a vote by EAC Commissioners at the earliest opportunity after a quorum of Commissioners have been appointed.

On September 23, 2014, the EAC conducted its biennial policy and procedures audit of Pro V&V to fulfill the requirements of Section 4.5.1 of the U.S. Election Assistance Commission (EAC) *Voting System Test Laboratory Program Manual (Manual)*. This section of the Manual requires the EAC to conduct an on site review once every two years to verify that the laboratories policies, procedures and practices meet the requirements of the EAC laboratory accreditation program and international standards.

The EAC audit assessment of Pro V&V found no nonconformities in the lab policies or procedures determined to be critical to the VSTLs technical capability to test voting systems. In addition, the audit assessment found no items that would require the laboratory to initiate immediate corrective action or to formally resolve a noncritical noncompliance. The EAC recommended the following improvements to Pro V&V:

1. Section 1.1 of the Pro V&V Quality Manual states that Pro V&V only functions as a testing laboratory. Because Pro V&V also engages in consulting work, the EAC recommends that the Quality manual be amended to reflect this fact.
2. The EAC noticed a typographical error in paragraph 5 of Section 1.1 in the Pro V&V Quality Manual. The EAC recommends that this typo be corrected.
3. The EAC review of Pro V&V Quality Procedure QP-70 "Service to Customer" noted that Pro V&V sends a customer survey to each client at the conclusion of each test engagement to receive both positive and negative feedback from the customer experience. Because the EAC auditor noted limited responses to these surveys, the EAC recommends that Pro V&V send at least one follow-up notice to clients requesting that they complete the customer survey in order to provide valuable feedback to the laboratory.

Pro V&V fully addressed these recommendations in a submission to the EAC on January 21, 2015.

Upon an affirmative Commission vote on this accreditation, I will inform the VSTL of the decision, issue a Certificate of Accreditation, update the EAC website, and inform stakeholders of the Commission's decision.

An EAC grant of accreditation is valid for a period of two years. VSTLs renew their accreditation by submitting an application package, consistent with the procedures in §3.4 of the EAC Laboratory Accreditation Program Manual (v.1.0). A VSTL retains its accreditation during the EAC application review period.