

The Voting System Test Laboratory (VSTL) accreditation program is an essential component of the EAC's Voting System Testing and Certification Program. The EAC has made National Institute of Standards and Technology's (NIST) National Voluntary Laboratory Accreditation Program (NVLAP) accreditation a requirement as part of its VSTL accreditation program. NVLAP accreditation is **the primary means by which the EAC ensures that each VSTL meets and continues to meet the technical requirements** of the EAC program. It sets the standards for each VSTL's technical, physical and personnel resources, as well as its testing, management, and quality assurance policies and protocols. NVLAP reviews VSTLs one year after their initial accreditation and biennially thereafter.

The EAC takes additional steps to ensure that laboratory policies are in place regarding compliance management and issues like conflict of interest, record maintenance, and financial stability. It also ensures that the VSTL is willing and capable to work with EAC in its Testing and Certification Program. This is performed by regularly working closely with the labs and performing audits biannually and generating certificates. <sup>1</sup>The VSTL accreditation does not get revoked unless the commission votes to revoke accreditation; and by that same token, EAC generated certificates or lack thereof do not determine the validity of a VSTL's accreditation status.

**Due to administrative error** during 2017-2019, the EAC did not issue an updated certificate to Pro V&V causing confusion with some people concerning their good standing status. Even though the EAC failed to reissue the certificate, Pro V&V's audit was completed in 2018 and again in early 2021 as the scheduled audit of Pro V&V in 2020 was postponed due to COVID-19 travel restrictions. Despite the challenges outlined above, throughout this period, Pro V&V and SLI Compliance remained in good standing with the requirements of our program and retained their accreditation. **In addition, the EAC has placed appropriate procedures and qualified staff to oversee this aspect of the program ensuring the continued quality monitoring of the Testing and Certification program is robust and in place.** 

The Testing and Certification program has been fully staffed since May 2019, and we are confident that the integrity of the labs and our voting system certification program has remained strong throughout. The lack of generating a new certificate does not indicate that the labs were out of compliance. All certifications during this period remain valid as does the lab accreditation. The quality of our labs' work is closely monitored during certification campaigns. Both Pro V&V and SLI Compliance are NAVLAP accredited laboratories that are assessed against the management and technical requirements published in the International Standard, ISO/IEC 17025:2017.

<sup>1</sup> Pro V&V was accredited by the EAC on February 24, 2015, and SLI Compliance was accredited by the EAC on February 28, 2007. Federal law provides that EAC accreditation of a voting system test **laboratory cannot be revoked unless the EAC Commissioners vote to revoke the accreditation**: "The accreditation of a laboratory for purposes of this section may not be revoked unless the revocation is approved by a vote of the Commission." 52 U.S. Code § 20971(c)(2). The EAC has never voted to revoke the accreditation of Pro V&V. Pro V&V has undergone continuing accreditation assessments and had new accreditation certificate issued on February 1, 2021.