

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE**

**REPORT CONCERNING THE EXAMINATION RESULTS OF HART
VERITY VOTING 2.6 WITH VERITY SCAN PRECINCT SCANNER,
VERITY COUNT TABULATING AND REPORTING SOLUTION,
VERITY CENTRAL - CENTRAL SCANNING SOLUTION, VERITY
TOUCH WRITER AND TOUCH WRITER DUO BALLOT MARKING
DEVICE, VERITY DATA - ELECTION DATA ENTRY SOFTWARE
AND VERITY BUILD ELECTION DEFINITION SOFTWARE**



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Acting Secretary of the Commonwealth
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EXAMINATION RESULTS OF HART VERITY VOTING 2.6 VOTING SYSTEM WITH VERITY SCAN PRECINCT SCANNER, VERITY COUNT TABULATING AND REPORTING SOLUTION, VERITY CENTRAL - CENTRAL SCANNING SOLUTION, VERITY TOUCH WRITER AND TOUCH WRITER DUO BALLOT MARKING DEVICE, VERITY DATA ELECTION DATA ENTRY SOFTWARE AND VERITY BUILD ELECTION DEFINITION SOFTWARE

I. INTRODUCTION

Article XI-A of the Pennsylvania Election Code, 25 P.S. §§ 3031.1 *et seq.*, authorizes the use of electronic voting systems. Section 1105-A of the Pennsylvania Election Code, 25 P.S. § 3031.5, requires that the Secretary of the Commonwealth (Secretary) examine all electronic voting systems used in any election in Pennsylvania and that the Secretary make and file a report stating whether, in her opinion, the electronic voting system can be safely used by voters and meets all applicable requirements of the Election Code. Based on a letter of intent for presenting the Verity Voting 2.6 system for Pennsylvania (PA) state certification from Hart Intercivic Inc. (Hart), the Department of State's Bureau of Commissions, Elections and Legislation (Department) scheduled an examination for January 11, 2022, of Verity Voting 2.6 voting system.

The then Secretary of the Commonwealth (Secretary) appointed SLI Global Solutions and Center for Civic Design (CCD) as professional consultants to conduct an examination of Verity Voting 2.6 voting system. The examination process included a public demonstration and functional examination (functional examination), accessibility examination and security testing.

The functional examination commenced on January 11, 2022 and was performed in Room G24A/B of the Commonwealth Capitol Complex - Finance Building, 613 North Street, Harrisburg, PA 17120. Jonathan Le, Senior Test Engineer of SLI Global Solutions (Functional Examiner), conducted the functional examination of the Verity Voting 2.6 pursuant to Section 1105-A(a) of the Election Code, 25 P.S. § 3031.5(a). Jessica Mathis, Director of the Bureau of Elections and Notaries and Sindhu Ramachandran, Voting Systems Analyst, represented the Secretary of the Commonwealth. Cory Hinkle, Certification Project Manager, represented Hart. Additional staff members from Hart

Intercivic and the Department also attended the examination. The functional examination was open to the public and was videotaped by Department staff.

The Functional Examiner performed functional examination of Verity Voting 2.6 lasting over approximately three days starting on January 11, 2022, details of which are explained in further sections of this report. The Accessibility Examination for Verity Voting 2.6 was limited to demonstrating only the changes to the system between 2.3.4 and 2.6 and the accessibility examiner verifying that the changes did not affect accessibility. The changes were reviewed by Whitney Quesenbery (Accessibility Examiner) representing CCD via a video conference done on January 13, 2022. A full accessibility examination was performed on Verity Voting 2.3 and hence the examination was limited to review of the changes.

The security testing of the Hart Verity Voting 2.6 was conducted at SLI Global Solutions labs located in Wheat Ridge, Colorado. Jesse Peterson and Mike Santos representing SLI performed the security examination.

II. THE HART VERITY VOTING 2.6 VOTING SYSTEM

Verity Voting 2.6 is a paper-based voting system that provides end-to-end election support, from defining an election to generating final reports. The system presented for certification in Pennsylvania is comprised of the following components:

Software/Firmware

- Verity Data 2.6.0 – Data management software application.
- Verity Build 2.6.0 – Election definition software application.
- Verity Central 2.6.0 – Central scanning software application.
- Verity Count 2.6.0 – Tabulation and reporting software application.
- Verity User Management 2.6.0 – User management software application.
- Verity Election Management 2.6.0 – Election management software application.

Verity Print 2.6.0 – On demand ballot-production device.

Note: Verity User Management and Verity Election Management are components that perform specific functions and can be used with Verity Data, Verity Build, Verity Central and Verity Count.

Voting Devices¹

- Verity Scan 2.6.0 – digital scanning voting device
- Verity Touch Writer 2.6.0 – Ballot marking device
- Verity Touch Writer Duo 2.6.0 – Ballot marking device with internal COTS ballot summary printer and Audio Tactile Interface
- Verity Controller 2.6.0 – Polling place management device for use with Verity TouchWriter Duo
- Verity Print 2.6.0 – On demand ballot production device
- Verity AutoBallot – Optional barcode scanner kit for Verity Controller, Verity Print, Verity Touch Writer, and Verity Touch Writer Duo Standalone

The following is a description of the Verity 2.6 components summarized from the System Overview section of the Functional Examiners’ report and Verity System administrators guide document and Polling Place field guide submitted by Hart as part of the voting system Technical Data Package (TDP).

Verity Data

In Verity Data, jurisdictions can enter, import and manage election data, jurisdiction data, and translations, and record and import audio. Verity Data allows election officials to choose ballot templates, view ballot previews, and lock the election data so that it may be opened in Verity Build.

¹ Verity Touch and Verity Touch with access, the DRE components of the Verity 2.6, are not certified for use in Pennsylvania.

Verity Build

In Verity Build, election officials can open an election, proof data, configure device settings, print ballots, and write vDrives and Verity Keys.

Verity Central

Verity Central is an application designed to manage central ballot scanning operations. With Verity Central, election officials can scan and review ballots, resolve write-in votes and voter intent issues, and write cast vote records to vDrive for tabulation in Verity Count.

Verity Count

Verity Count is Verity's comprehensive application for ballot tabulation and reporting. In Count, election officials will read vDrives, tabulate ballots, resolve write-in votes, print reports, and export election results.

Verity User Management

User management application allows an authorized user to add and manage other users, define and edit user roles, manage user policies, and update user passwords.

Verity Election Management

In the Election Management application, administrators can add, copy, import, export, rename, delete, archive, and restore elections created in the Verity system.

Verity Print

Verity Print is a pre-voting ballot production device for use by election officials and/or poll workers. Verity Print produces unmarked paper ballots. Print is paired with a commercial off-the-shelf printer to allow the user to select and print the desired ballot style. The Verity Print device is activated so the election official can print one or more blank ballots from one selected precinct at a time. Ballots can be printed on-demand for

immediate use, or they can be printed in advance for additional inventory.

Verity Scan

Verity Scan is a polling place digital scanner for paper ballots. Scan is paired with a purpose-built ballot box. Once the polls are open, to vote, voters simply insert their ballots and then voters wait for Verity Scan to indicate that the ballot has been successfully cast. Verity Scan also provides warnings to voters on undervotes, overvotes, and blank ballots as specified in the election definition. After scanning, a Cast Vote Record is stored on vDrive portable flash media. Verity Scan provides a capability to print an end of day report at close of polls. vDrives with cast vote records can also be tabulated by the Verity Count software application. Verity Scan includes a compact and durable integrated storage case for secure, easy transportation and storage.

Verity Touch Writer Duo

Verity Touch Writer Duo is a ballot marking device for paper ballots. Voters use the electronic interface to privately and independently make their selections on the ballot. Voters can also make selections with Verity Access, an Audio-Tactile interface (ATI) component with three tactile buttons, one audio port for headphones, and one port for external two-switch devices. When voters finish making their selections, they print the marked ballot. Verity Touch Writer Duo has an integrated printer. The printed ballot with voter selections is scanned by the Verity Scan using Optical Character Recognition (OCR) technology. Touch Writer Duo is configured for use in a daisy-chained network with the Verity Controller.

Verity Controller

Verity Controller is a polling place management device that is used to generate random access codes for voters. Access Codes are used to activate a ballot session on Verity Touch Writer Duo. Up to 12 Touch Writer Duo devices can be connected to a single

Verity Controller.

Verity Access

Verity Access is an audio tactile interface (ATI) controller that is connected to Verity Touch Writer Duo ballot marking devices as a complement to the touchscreen display, to provide additional options for accessible voting. Access has three tactile buttons, one audio port, one port for two-switch adaptive devices (such as “jelly switches” or sip-and-puff devices), and a custom USB cable. Jacks for headphones and adaptive devices are located on the top edge of the device, and the device has gripping surfaces on either side.

Verity AutoBallot

Verity AutoBallot is an optional barcode scanner kit for Verity Controller and Verity Print that allows air-gapped integration between an e-pollbook check-in process and the task of selecting the proper ballot style for the voting system. AutoBallot automates the ballot style selection process by allowing poll workers to scan a barcode output from an electronic poll book and activate the correct ballot style with the click of a button, thereby reducing human error. The optional AutoBallot kit includes a COTS barcode scanner with attached USB cable and a custom vDrive compartment door that allows connection of the barcode scanner to the Verity device.

Ballot Box

Verity Ballot Box includes separate secure compartments for scanned and un-scanned ballots, and it folds for easy transportation and storage.

Voting Booth

Voting Booth is designed for use with Verity Touch Writer Duo. The booth includes only three parts to assemble, and it also includes nylon privacy screens. ADA-compliant versions of the Verity voting booth are designed for keeping accessibility and controls

within reach.

Verity vDrive

vDrives are flash memory media devices that carry the election definition from Verity Build to Verity devices, including Scan, Touch Writer Duo, Print, and Controller. vDrives also store cast vote records (CVRs) and audit information. After polls are closed, vDrives can be removed from devices to transfer CVRs and/or audit logs to Verity Count. vDrives are also used to store CVRs associated with scanned ballots in Verity Central. vDrives from Scan and Central are read into count, which tabulates votes and reports results.

Verity Key

Verity Key is a two-factor authentication device used to secure access to critical functions throughout the election. Two-factor authentication means that users must have the physical key device, which is similar to a USB token, as well as knowing the passcode associated with the physical security device. This electronic device is required for access to secure functions in the Build, Central, and Count applications, including tasks such as accepting ballot styles, opening new election functions, and tabulating votes, and is required to configure devices for use in an election.

Manufacturer Software/Firmware

The Verity Voting 2.6 voting system consists of the following custom software and firmware components:

Application	Version
Verity Data	2.6.0
Verity Build	2.6.0
Verity Central	2.6.0
Verity Count	2.6.0
Verity Print	2.6.0
Verity Scan	2.6.0
Verity Touch Writer Duo	2.6.0
Verity Touch Writer	2.6.0
Verity Controller	2.6.0

COTS Software/Firmware

Additional COTS software and firmware included in the system has been defined as part of the EAC system certification scope added to this report as Attachment A.

Hardware

Below is a listing of the custom hardware components that comprise the Hart Verity Voting 2.6 voting system:

Component	Version
Verity Print – Ballot Printer	3005356 Rev E
Verity Print – Ballot Printer	3005856 Rev B
Verity Scan – Paper Ballot Scanner	3005350 Rev I
Verity Scan – Paper Ballot Scanner	3005800 Rev B
Verity Touch Writer – Electronic BMD Device	3005352 Rev H
Verity Touch Writer – Electronic BMD Device	3005852 Rev B
Verity Touch Writer Duo – Electronic BMD Device	3005700 Rev B
Verity Touch Writer Duo Standalone – Electronic BMD Device	3005730 Rev A
Verity Controller – Networked Centralized Management Device	3005351 Rev E
Verity Controller – Networked Centralized Management Device	3005825 Rev B

COTS Hardware

Additional COTS hardware included in the system has been defined as part of the EAC system certification scope added to this report as Attachment A.

Test Materials

- Ballots & blank ballot-grade paper
- Thumb drives
- Ballot-marking pens
- Printer paper rolls

III. EXAMINATION APPROACH, PROCEDURES AND RESULTS

A. Examination Approach

Functional Examination

To ascertain whether Verity Voting 2.6 can be safely used by voters at elections in the Commonwealth and meets all the requirements of the Pennsylvania Election Code, the Examiner developed test protocols for the examination. The test protocols separated the requirements of Article XI-A of the Pennsylvania Election Code, Sections 1101-A to 1122-A, 25 P.S. §§ 3031.1 - 3031.22, into five main areas of test execution: (1) Documentation Review; (2) System Level Testing; (3) Security/Penetration Testing; (4) Privacy Analysis; and (5) Usability Analysis.

Documentation review was performed to verify that the portions of the Pennsylvania Election Code which reference documentation detail are sufficiently met by the Hart Verity Voting 2.6 documentation. The Functional Examiner validated compliance of the system with the following sections of the Election Code during the documentation review.

- 1105-A(a), 25 P.S. § 3031.5(a), requiring that an electronic voting system has been examined and approved by a federally recognized ITA;
- 1107-A(11), 25 P.S. § 3031.7(11), requiring an electronic voting system to be suitably designed in terms of usability and durability, and capable of absolute accuracy;
- 1107-A(13), 25 P.S. § 3031.7(13), requiring an electronic voting system to correctly tabulate every vote;
- 1107-A(14), 25 P.S. § 3031.7(14), requiring an electronic voting system to be safely transportable; and
- 1107-A(15), 25 P.S. § 3031.7(15), requiring an electronic voting system to be designed so voters may readily understand how it is operated.

SystemLevel Testing examined the Verity Voting 2.6 voting system in terms of conducting an election. The Functional Examiner prepared election definitions using Verity Data and Verity Build. vDrives and Verity Keys were created to populate the elections to

the required components (Verity Central, Verity TouchWriter, Verity Touch Writer Duo/Controller, Verity Touch Writer Duo standalone, Verity Scan and Verity Print) using the Verity Build software. Votes were captured using Verity Touch Writer, Touch Writer Duo and ballots were printed and tabulated via Verity Scan. Ballots were also marked manually and then tabulated through the polling place Verity Scan scanner configured to scan hand-marked ballots. All ballots (hand-marked paper ballots, Touch Writer and Touch Writer Duo ballots) created were then tabulated through the Verity Count central scanning solution twice, once through each supported COTS scanner. Tabulation results were then processed using the Verity Count tabulation and reporting solution, write-in votes were adjudicated, and reports were generated with results for the election. The results reports were then validated against the expected results of the voted ballots.

All components of the Verity Voting 2.6 system were examined to verify that they meet all pertinent requirements of the Pennsylvania Election Code. The test cases were designed to ascertain compliance with the following sections of the Election Code:

- 1101-A, 25 P.S. § 3031.1, requiring an electronic voting system to provide for a permanent physical record of all votes cast;
- 1107-A(2), 25 P.S. § 3031.7(2), requiring an electronic voting system to permit voting on both candidates and ballot questions, according to the official ballot;
- 1107-A(4), 25 P.S. § 3031.7(4), requiring an electronic voting system to permit a voter to vote for candidates of all different parties, and write-in candidates;
- 1107-A(5), 25 P.S. § 3031.7(5), requiring an electronic voting system to permit a voter to enter write-in votes;
- 1107-A(6), 25 P.S. § 3031.7(6), requiring an electronic voting system to permit a voter to cast votes for candidates and ballot questions he or she is entitled to vote for, and prevents a voter from casting votes the voter is not entitled to vote on;
- 1107-A(7), 25 P.S. § 3031.7(7), requiring an electronic voting system to prevent over-votes;
- 1107-A(8), 25 P.S. § 3031.7(8), requiring an electronic voting system to prevent a person from casting more than one vote for a candidate or question, except where this type of cumulative voting is permitted by law;

- 1107-A(9), 25 P.S. § 3031.7(9), requiring an electronic voting system to permit voters to vote in their own parties' primaries, and prevents them from voting in other parties' primaries, while also permitting voters to vote for any nonpartisan nomination or ballot question they are qualified to vote on;
- 1107-A(10), 25 P.S. § 3031.7(10), requiring an electronic voting system that registers votes electronically to permit voters to change their votes up until taking the final step to register the vote, and for systems that use paper ballots or ballot cards, permits a voter to get a new ballot in the case of a spoiled ballot, and to mark and cancel the spoiled ballot;
- Parts of 1107-A(16), 25 P.S. § 3031.7(16), requiring an electronic voting system which provides for district-level tabulation to include (i) a public counter to register how many ballots are submitted to be counted; (iv) will not tabulate an over-vote, with an option to notify a voter of an over-vote if used during voting hours; and (v) generates a printed record that counters are set to zero before voting commences; and
- Parts of 1107-A(17), 25 P.S. § 3031.7(17), requiring an electronic voting system which provides for central-count tabulation to (ii) preclude tabulation of an over-vote; and (iii) indicate that counters are set to zero before processing ballots, either by district or with the capability to generate cumulative reports.

The Functional Examiner also used the System Level Testing to further evaluate the design and accuracy aspects of the system as required by Sections 1107-A(11) and (13), 25 P.S. §§ 3031.7(11) & (13), through his use at public demonstration and testing, even though the requirements were already validated in the documentation review phase by reviewing EAC certification reports.

The Security/Penetration Analysis examined the voting system's compliance with the requirements of the Pennsylvania Election Code by analyzing physical security procedures and impoundment of ballots. Precinct tabulation devices were installed for delivery to the precinct, and the Functional Examiner analyzed the pertinent security procedures performed on each device to ascertain compliance with Section 1107-A(12), 25 P.S. § 3031.7(12), requiring an electronic voting system to provide acceptable ballot security procedures and impoundment of ballots to prevent tampering with or substitution of any ballots or ballot cards. The Functional Examiner also used the security analysis phase of testing to validate compliance with parts of Sections 1107-A(16) and (17), 25 P.S. §§ 3031.7(16) & (17), related to system security.

The Privacy Analysis examined the voting system's compliance with Section 1107-A(1) of the Election Code, 25 P.S. § 3031.7(1), requiring that an electronic voting system provide for absolute secrecy of the vote, by analyzing how the polling place devices (Verity Scan, Verity Touch Writer and Verity Touch Writer Duo) met the pertinent privacy requirements.

The Usability Analysis evaluated the compliance of the voting system with Sections 1107-A(14) and (15), 25 P.S. §§ 3031.7(14) & (15). The results from the tests were used by the Functional Examiner to supplement his conclusions from the documentation review phase.

Accessibility Examination

The accessibility examination was designed to provide insight and information on each voting system's usability and accessibility, especially for voters with disabilities and for poll workers responsible for managing the system on Election Day. The accessibility examination for Verity Voting 2.6 was specifically to review and confirm that the updates to the system did not create any issues for accessibility.

Security Testing

The Security testing provided a means to assess the required security properties of the voting system under examination and ascertain compliance with the Pennsylvania Election Code requirements, including 25 P.S. §§ 3031.7(11), (12), (16), & (17). The security tests specifically addressed confidentiality, vote anonymity, integrity, availability, and auditability of the voting systems. The security examiner also prepared a vulnerability assessment and performed penetration testing of the Verity voting system. The testing was done at SLI Labs in Wheat Ridge, Colorado. The test report identified test procedures and results of the testing.

B. Examination Process and Procedures

The examination process and procedures followed for Verity Voting 2.6 examinations are listed in the below sections. The final determination in this report is based on the combined analysis of the results and conclusions from all the tests.

Verity Voting 2.6 Examination

Functional Examination

Hart supplied all the hardware equipment required for the examination. All software and firmware necessary to perform the examination was received directly from the Voting System Test Laboratories (VSTL) that tested the voting system for EAC certification. The trusted build of the software and firmware for each device being evaluated were installed using the appropriate media for installation. The hash codes for all system components were captured using the process listed in the manufacturer's Technical Data Package (TDP) by the Functional Examiner with assistance from a Hart representative. The Functional Examiner further compared and confirmed that all the captured hash codes matched the hash codes for the EAC certified system executables before executing the test scripts.

Testing at Capitol Complex Harrisburg during the week of January 11, 2022

The Functional Examiner created the election data definition using Verity Data and created the Verity Keys and vDrives for the election using Verity Build. Polling place devices Verity Scan, Verity Touch Writer, and Verity Touch Writer Duo (standalone and controller) were prepared for election day voting. The election was also loaded to Verity Central and Verity Count and the devices and COTS components were prepared for scanning and tabulation respectively. The polling place was set up and the functional examiner performed System Level Testing (closed primary and general election). Polls were closed and results were tabulated and reconciled with expected results. Ballots were scanned on the central scanning solution, Verity Central, and results were validated against expected results. The functional examiner also performed the security analysis, usability analysis and privacy analysis.

Accessibility Examination

The accessibility examination portion was done on the Verity Voting 2.6 system and commenced on January 13, 2022, and was done via a demonstration of the ballot marking devices. Whitney Quesenbery observed the demonstration via a teleconference and submitted a report to the Secretary. A full accessibility examination including expert review, use by voters and poll worker review as conducted on Verity 2.3 and all the findings from the report apply to Verity Voting 2.6 system implementation.

Security Testing

The security testing is comprised of a series of test suites which are used to verify that a voting system will correspond to applicable security requirements within the Pennsylvania Election Code and the Pennsylvania Voting System Security standard. Security testing covered the aspects of confidentiality, anonymity, integrity, availability, auditability and accountability. The tests included documentation review, design, software security, network, audit logging and physical security. The Security Examiner also performed penetration testing of the Hart Verity Voting 2.6 voting system.

During the security testing of the election system, a cross section of the VVSG 2005 requirements were retested as a due diligence measure to ensure that nothing was missed during the EAC certification effort of the Verity Voting solution.

The tests also included in-depth verification and validation of reports and audit logs generated by the systems under test to verify and validate that all the requirements have been met. The security examiner also noted that the tests included in-depth examination of election-specific results and media, reports and audit logs, including attempts to decrypt, manipulate, and corrupt election data in an attempt to change or influence the final results of an election.

C. Examination Results

Verity Voting 2.6 Functional Examination

The Functional Examiner's report indicated successful completion of tests executed to ascertain compliance with the requirements mandated by the Pennsylvania Election Code. The examiner report for Verity Voting 2.6 included details of the test cases, execution and successful completion. The following section is a summary of the results of the examination as set forth in fuller detail in the examiner's report.

1. Documentation Review

The Documentation Review testing performed by the Functional Examiner demonstrates that the Verity Voting 2.6 meets the relevant requirements of the Pennsylvania Election Code. The examiner reviewed the "Draft Test Report for EAC 2005 VVSG Certification Testing of Verity Voting 2.6 Voting System." Verity Voting 2.6 was certified by the EAC on April 20, 2021, and hence complies with Section 1105-A(a) of the Election Code, 25 P.S. § 3031.5(a), which requires that a voting system must be examined and approved by a federally recognized, independent testing authority (ITA), or VSTL (as such authorities are now called), as meeting the applicable performance and test standards established by the federal government. The final EAC certification scope is added to this report as Attachment A.

The Functional Examiner concluded that the design requirements of Sections 1107-A(11) and (14) of the Pennsylvania Election Code, 25 P.S. §§ 3031.7(11) & (14), are met by the combination of EAC hardware Non-Operating Environmental Tests, which included bench handling, vibration, low temperature, high temperature, humidity and product safety tests. The system accuracy testing during EAC certification testing provided confirmation of system accuracy as required by Section 1107-A(11) of the Pennsylvania Election Code, 25 P.S. § 3031.7(11).

The system summative usability test reports were accepted by the EAC as part of the Federal Certification. This, along with the Functional Examiner's use of the system,

demonstrates that the system can be readily learned and hence satisfied the usability requirement of Section 1107-A(15) of the Pennsylvania Election Code, 25 P.S. § 3031.7(15).

2. System Level Testing

As set forth in the examination approach, System Level Testing was divided into two separate tests, a closed primary election and a general election. The ballots defined had contests with voting variations supported in Pennsylvania.

A closed primary election consisting of two parties (Republican, Democratic), and three precincts was conducted utilizing software components - Verity Data, Verity Build, Verity Central and Verity Count and Verity Devices – Verity Touch Writer, Verity Touch Writer Duo and Controller, Verity Scan, Verity Central with COTS Scanner. For each precinct, the test used different ballot styles, each of which contained unique sets of contests and candidates, for which the examiner voted for candidates and questions. The election contained 40 contests: 38 partisan (19 Republican and 19 Democratic) contests and two referendums. 23 “Vote for One”, 2 “Vote for no more than Two”, 3 “Vote for no more than Three”, 10 “Vote for no more than Four” and 2 “Vote for no more than Fifteen”. The Functional Examiner validated compliance of the system to Sections 1101-A and 1107-A(2), (5)-(11), 25 P.S. §§ 3031.1, 3031.7(2), (5)-(11). No issues or anomalies were experienced during these tests, and the objective criteria established in the test protocols were met.

A general election consisting of four parties (Republican, Democratic, Green and Libertarian), three precincts (one of which was a split precinct), and 21 contests: 19 partisan contests and two retention referenda, 12 “Vote for One”, 2 “Vote for no more than Two”, 6 “Vote for no more than Three”, and 1 “Vote for no more than Fifteen”. was run utilizing software components - Verity Data, Verity Build, Verity Central and Verity Count and Verity Devices – Verity Touch Writer, Verity Touch Writer Duo and Controller, Verity Scan, Verity Central with COTS Scanners. The Functional Examiner examined the

compliance of the system to Sections 1101-A and 1107-A(2)-(8), (10)-(11) and (13), 25 P.S. §§ 3031.1, 3031.7(2)-(8), (10)-(11) & (13).

The Functional Examiner included test cases to validate Sections 1107-A(16) and (17), 25 P.S. §§ 3031.7(16) & (17), which mandate that voting systems generate zero-proof reports and correctly handle over-votes during the election runs. The remainder of the requirements of 25 P.S. §§ 3031.7(16) and (17) were validated by the Functional Examiner during the Security/Penetration Analysis.

Election data definitions for both primary and general elections were created within Verity Data, and Verity Keys and vDrives were created using Verity Build. The election was loaded to the Verity Touch Writer, Verity Controller/Duo, Verity Scan, Verity Count and Verity Central. Polls were opened and ballots were marked manually, as well as electronically via the Verity Touch Writer and Verity Touch Writer Duo Ballot Marking Devices, then tabulated through the polling place Verity Scan scanner. All ballots (hand-marked, and Touch Writer and Duo) created were then tabulated through the Verity Central, central scanning solution using COTS scanners. Tabulation results for precinct and central scanning solution were then processed into Verity Count, and reports were generated with results for the election. The result reports were confirmed to match the expected results of the voted ballots.

The Functional Examiner used English and Spanish ballots for the test. Each specific hardware and software component were tested for compliance with the required sections of the Election Code.

Verity Voting 2.6 is a paper-based system and paper ballots provide a permanent physical record of each vote cast, adhering to Section 1101-A, 25 P.S. § 3031.1. Hand-marked paper ballots and Verity Touch Writer Duo-marked ballots are printed and tabulated on Verity Scan precinct scanner or Verity Central, central scanning solution.

The primary and general election definitions were created using Verity Data and Verity Build and loaded to polling place devices and central scanners, which provided

assurance that the system can perform ballot creation activities. The Functional Examiner successfully added contests, parties, choices, precincts, districts, ballot styles, referendum questions and retention contests with appropriate candidates and choices. The Verity Touch Writer, Touch Writer Duo and Verity Scan components of the Verity Voting 2.6 successfully permitted votes for "1 of 1," "N of M," and "Question" contests for a standard and ADA voting session. The Functional Examiner thus concluded that the system is in compliance with Section 1107-A(2), 25 P.S. § 3031.7(2).

Each of the applicable components of Verity Voting 2.6 allowed the test voter to cast a write-in vote and demonstrated compliance with Section 1107-A(5), 25 P.S. § 3031.7(5).

Verity Voting 2.6 meets the requirements for Section 1107-A(6), 25 P.S. § 3031.7(6), because the test voters cast votes on different ballot styles for candidates and questions and the Verity Touch Writer and Touch Writer Duo displayed only contests for which the voter was entitled to vote.

The system's compliance with Section 1107-A(7), 25 P.S. § 3031.7(7), was demonstrated since Verity Scan has the capability to indicate overvotes for any office and the voter has the ability to either spoil the ballot or cast the ballot with overvotes if the voter decides to do so. Verity Touch Writer and Verity Touch Writer Duo did not allow overvotes. The Functional Examiner also noted that the system allowed undervotes but warned the user about the undervote when configured to do so.

The successful validation of the election results shows that central scanning solution Verity Central, as well as precinct tabulator Verity Scan, include the capability to reject all choices recorded on the ballot for an office or question if the number of choices exceeds the number for which the voter is entitled to vote, adhering to Section 1107-A(8), 25 P.S. § 3031.7(8).

The Verity Voting 2.6 complies with Section 1107-A(9), 25 P.S. § 3031.7(9), because test voters in the closed primary election were only able to vote for referendum questions and candidates seeking the nomination of their party.

Adherence to Section 1107-A(10), 25 P.S. § 3031.7(10), was demonstrated for both ADA and standard voting sessions. Verity Touch Writer and Verity Touch Writer Duo allowed the voters to review their ballots before printing for tabulation on precinct scanner Verity Scan or central scanning solution Verity Central. The Functional Examiner attempted to change votes on Verity Touch Writer and Verity Touch Writer Duo for candidates within the contest, as well as after leaving the contest and then returning to other contests and while reviewing the summary screen. The tests demonstrated that Verity Touch Writer and Verity Touch Writer Duo allowed changing the selections until the voter decides to print or cast the ballot. The Verity Scan precinct scanner of Verity Voting 2.6 provides the voter with a caution message when the ballot contains potential errors, such as the presence of overvotes or undervotes. The voter is presented with a message that explains the error on the screen when the tabulator detects potential errors, and the ballot is returned. The voter can either decide to affirm their intent by casting the ballot, or they can spoil the ballot and fill out another ballot.

The accuracy requirements of 1107-A(11), 25 P.S. § 3031.7(11) were ascertained by reviewing EAC test reports and were further validated by the successful tabulation and validation of the primary and general elections run by the Functional Examiner.

The Functional Examiner validated via test cases during the primary and general election that the tabulating devices Verity Scan and Verity Central generated zero-proof reports only before ballots were cast, the system rejected all votes for the contest in an overvote situation, and produced a results report when appropriately configured as required under Sections 1107-A(16) and (17), 25 P.S. §§ 3031.7(16) & (17). The Functional Examiner confirmed that the zero-proof report cannot be generated on demand after a ballot is cast.

The voting variations used for the examination included write-in votes to ensure that all components of the system will identify the appropriate write-ins and allow the election official to tabulate all cast votes, including write-in votes. The Verity Touch Writer and Verity Touch Writer Duo ballot marking devices allowed the voter to cast write-in votes.

The Verity Scan and Verity Central systems identified write-ins on hand-marked and machine-marked ballots and allowed the adjudication of write-in votes during tabulation. The Functional Examiner hence concluded that Verity Voting 2.6 complies with Section 1107-A(13), 25 P.S. § 3031.7(13).

3. Security/Penetration Analysis

The Functional Examiner adopted a strategy to review each pertinent requirement for this test individually and then created test cases to address it in either a documentation review, a functional test, or both.

Precinct-tabulation devices and ballot marking devices were configured for delivery to a polling place from a warehouse including all seals and locks recommended by the manufacturer. The central scanners were configured for operation in a county office. The devices were inspected to determine how their design stands up to potential tampering. The inspection consisted of examining ports, outer case and memory devices to confirm that they were all secure and the locks and seals were tamper proof and evident. The Functional Examiner also examined the components of the Verity Voting 2.6 system for password management of administrative functions and ensured that the system counter could not be reset by unauthorized persons. In addition, the Functional Examiner also reviewed Hart system documentation for suggested ballot security procedures at the polling place and central location to ensure that the manufacturer recommended the required steps for configuring the Verity Voting 2.6 securely for the election. Based on the tests, the Functional Examiner concluded that that the system complies with Section 1107-A(12), 25 P.S. § 3031.7(12).

The Functional Examiner included test cases during the Security/Penetration Analysis phase of the testing to evaluate the security requirements mandated by Sections 1107-A(16) and (17), 25 P.S. §§ 3031.7(16) & (17). The Functional Examiner validated that the tabulation device Verity Scan had a visible public counter and the system prevented authorized and unauthorized users any access to vote data while polls are open. Tests were completed to determine that USB ports do not allow any data or information to be

transferred to the Verity Scan and no maintenance, poll worker or administrative modes allow tampering with the tabulating element. The system did not allow polls to be opened without running a zero-proof report and the content of the report showed that all candidate positions, each question and the public counter were all set to zero. The functionality of the system to generate the close-of-polls report was verified and the report contents were analyzed to ensure that it contained the total number of ballots tabulated and total number of votes for each candidate and question on the ballot. Based on the above tests and the test cases executed while running the elections, the Functional Examiner concluded that Verity Voting 2.6 complies with all requirements mandated by 25 P.S. §§ 3031.7(16) and (17).

4. Privacy Analysis

The Functional Examiner reviewed and inspected the privacy aspects of Verity Voting 2.6 system to determine compliance with Section 1101-A(1) of the Election Code, 25 P.S. § 3031.7(1). The Functional Examiner determined that the components of the system used at the polling place comply with 25 P.S. § 3031.7(1) by review of system documentation and physical inspection. Central scanners were physically examined by the Functional Examiner for adequate visual secrecy. The Functional Examiner also verified that no voter data, including stored ballot images, are tied back to any specific voter in a manner that would compromise voter secrecy.

5. Usability Analysis

The Functional Examiner determined that Verity Voting 2.6 demonstrated compliance with the usability requirements of Section 1107-A(14) and (15) of the Election Code, 25 P.S. §§ 3031.7(14) & (15), by reviewing appropriate EAC certification reports and through his experiences using the various functionalities of the system during the examination.

Verity Voting 2.6 Accessibility Examination

The Accessibility Examiner reviewed the new features in the Hart Verity voting system. The Accessibility Examiner reviewed the documentation and changes notes for

versions Verity Voting 2.4, 2.5 and 2.6. The examiner responded, agreeing that most of the changes were technical in nature and were not directly relevant to the accessible voting experience.

Examiner Review

The Accessibility Examiner identified a short list of updates for discussion during the review:

- A new stand-alone configuration for Touch Writer Duo that does not require the controller and works similarly to the Touch Writer.
- A new Verity Duo Go carrier.

The examiner concluded the below based on the review:

- The stand-alone configuration for the Touch Writer was tested in the March 2019 accessibility testing. The new configuration for the Touch Writer Duo has the same interaction.
- The features, such as enhancements to ballot layouts, counting absentee voting, and reporting of different contest types, are all features for election administration and are not directly used by voters.
- References to straight-party voting are not relevant in Pennsylvania. The examiner also noted that the new carrier made it easier for poll workers to conduct “curbside voting.” This is an accessibility enhancement even though it is not relevant for Pennsylvania.

Verity Voting 2.6 Security Examination

Security tests were designed and executed to address election confidentiality, integrity, and availability. When applicable, some reviews were reinforced by equivalent test results that were achieved as part of an EAC certification test campaign.

Tests were also done to PA Test Specifications and included requirements for the following

security categories:

- Documentation Review
- Design
- Software Security - Access Control
- Network
- Audit Logging
- Physical Security
- Penetration Testing

The Security Examiner's report included evidence of conformity and notes from the SLI personnel who performed the tests. The security examiner also provided the risk assessment and deficiencies identified during the testing categorized into documentation, source code, hardware and functional discrepancies. The security examiner further provided mitigation steps for each of the deficiencies and the Department included those as conditions for the certification.

The Functional Examiner noted that the paper ballots will allow statistical recounts as required by Sections 1117-A, 25 P.S. § 3031.17.

The Functional Examiner identified that the following within Article XI-A of the Pennsylvania Election Code, Sections 1101-A to 1122-A, 25 P.S. §§ 3031.1 – 3031.22, are not applicable to the current examination, as each deal with non-functional testing aspects of acquisition, and use and maintenance aspects of a voting system:

- 25 P.S. § 3031.2;
- 25 P.S. § 3031.3;
- 25 P.S. § 3031.4;
- 25 P.S. § 3031.6;
- 25 P.S. § 3031.8;
- 25 P.S. § 3031.9;
- 25 P.S. § 3031.10;
- 25 P.S. § 3031.11;
- 25 P.S. § 3031.12;
- 25 P.S. § 3031.13;

- 25 P.S. § 3031.14;
- 25 P.S. § 3031.15;
- 25 P.S. § 3031.16;
- 25 P.S. § 3031.18;
- 25 P.S. § 3031.19;
- 25 P.S. § 3031.20;
- 25 P.S. § 3031.21; and
- 25 P.S. § 3031.22.

After all the testing activities, the Examiners and Department concluded that the Verity Voting 2.6 demonstrates compliance with all requirements as delineated in Article XI-A of the Pennsylvania Election Code, Sections 1101-A to 1122-A, 25 P.S. §§ 3031.1 – 3031.22.

D. Observations

During the examination, and in the review of documentation, the Examiner and/or Department staff noted the following observations:

1. Verity Voting 2.6 does not support cumulative voting.
2. The configuration of the system complying with the Pennsylvania Election Code requirements will require the use of appropriate selections of configurable parameters.
3. Observations/Findings identified during the Accessibility Examination identified in Attachment B.
4. The ADA-compliant, ballot marking devices Verity Touch Writer and Verity Touch Writer Duo presented as part of the Verity Voting 2.6 system, could be effectively used by all voters. This allows jurisdictions to expand the use of these devices for a larger universe of voters and not restrict their use to voters using assistive devices.

IV. Conditions for Certification

Given the results of the examination that occurred in January and February 2019 and

the findings of the Examiners as set forth in their reports, **the Secretary of the Commonwealth certifies the Verity Voting 2.6 subject to the following conditions:**

A. Pennsylvania counties using the Verity Voting 2.6 must comply with the Directive Concerning the Use, Implementation and Operations of Electronic Voting Systems by the County Boards of Elections issued by the Secretary of the Commonwealth on June 9, 2011, and any future revisions or directives. In particular, Pennsylvania counties must adhere to item four (4) of the directive when setting up and positioning the Verity Touch Writer Duo in the polling place to assure compliance with the constitutional and statutory requirements that secrecy in voting be preserved (*see* Pa. Const Art. VII § 4; and Section 1107-A(l) of the Election Code, 25 P.S. § 3031.7(1)).

B. No components of the Verity Voting 2.6 voting system shall be connected to any modem or network interface, including the Internet, at any time, except when used in a standalone local area wired network configuration in which all connected devices are certified voting system components. Transmission of unofficial results can be accomplished by writing results to media and moving the media to a different computer that may be connected to a network. Any wireless access points in the district components of Verity Voting 2.6, including wireless LAN cards, network adapters, etc., must be uninstalled or disabled prior to delivery or upon delivery of the voting equipment to a county board of elections.

C. Because Verity Voting 2.6 is a paper-based system, counties using the Verity Voting 2.6 must comply at a minimum with Section 1117-A of the Election Code, 25 P.S. § 3031.17, that requires a "statistical recount of a random sample of ballots after each election using manual, mechanical or electronic devices of a type different than those used for the specific election." This audit must be conducted via a manual count of the voter-marked paper ballots exclusively. Counties must include in the sample ballots such samples as may be marked by ADA-compliant components. Counties are advised to consult the Directive Concerning the Use, Implementation and Operations of Electronic Voting Systems by the County Boards of Elections issued by the Secretary of the Commonwealth on June 9, 2011,

and any future revisions or directives that may apply to audits of electronic voting systems.

D. All jurisdictions implementing the Verity Voting 2.6 need to carry out a full Logic and Accuracy test on each device without fail and maintain evidence of Logic and Accuracy (L&A) testing in accordance with the statutory requirements for pre-election and post-election testing. The Department does not recommend automated L&A testing and discourages the use of preprinted ballots provided by vendors. All components being used on election day, including accessible devices and any Electronic Poll Books being used, must be part of the L&A testing.

E. Verity Voting 2.6 is a paper-based system, and hence, implementation of the system for precinct or central count scanning is scalable. Jurisdictions should calculate the number of voting booths necessary to accommodate the number of registered voters in a precinct to avoid long lines. Jurisdictions must include the Verity Touch Writer Duo as an ADA-compliant device in configuring a precinct polling place. Jurisdictions must also take into consideration the ballot box capacities on polling place components when deciding on the number of voting booths.

F. All jurisdictions implementing the Verity Voting 2.6 must implement administrative safeguards and proper chain of custody to facilitate the safety and security of electronic systems pursuant to the Guidance on Electronic Voting System Preparation and Security, September 2016.

G. Jurisdictions implementing the Verity Voting 2.6 with the Central Count Tabulator as the primary system where votes are counted only at the central counting location using central scanners, must comply with Section 301(a) of Help America Vote Act of 2002. The mandate requires counties using central count paper-based systems to develop voting system-specific voter education programs that inform voters of the effect of over voting and instruct voters on how to correct a ballot before it is cast, including instructions on obtaining a replacement ballot. Additionally, the mandate requires that the central count voting system must be designed to preserve voter confidentiality.

H. All jurisdictions implementing the Verity Voting 2.6 must ensure that no default passwords are used on any devices including COTS components and that all passwords are complex and secured. Counties must implement an audit process to review and ensure that no default passwords are used upon equipment install/reinstall and routinely change passwords (at least once prior to preparing for each primary and general election) to avoid any password compromise. The passwords and permissions management must at a minimum comply to the password requirements outlined in NIST 800-63. This publication can be accessed at <https://pages.nist.gov/800-63-3/sp800-63-3.html>

I. All jurisdictions implementing Verity Voting 2.6 must configure the polling place components of the voting system to notify voters when they attempt to cast overvotes. This is to ensure that the system implementation adheres to the requirement of notifying the voter of overvotes as mandated by 25 P.S. § 3031.7(16).

J. All jurisdictions implementing Verity Voting 2.6 must work with Hart to ensure that only the certified system configuration is installed upon purchase and acceptance or any time a system component is replaced or upgraded. Jurisdictions must as part of their user acceptance test verify the implementation to ensure that the components, software and firmware belong to the certified system. Jurisdictions must also perform a trusted build validation as part of the election preparation activities and post-election canvass activities utilizing the vendor supplied methods of validation and verification of voting system integrity. A sample format that can be used for the attestation is added as Attachment C to this document.

K. The direct recording components of Verity Voting 2.6 voting system, Verity Touch and Verity Touch with access identified as system components per the EAC certification scope, are not certified for use in Pennsylvania with Verity Voting 2.6. This software was not presented to the Secretary for certification by Hart.

L. Jurisdictions implementing Verity Voting 2.6 must work with Hart to ensure that the implemented configuration is capable of operating for a period of at least two hours on backup power as required by the VVSG. If the system components don't include internal battery packs for reliable power, the Uninterruptible Power Supply (UPS) specified in the

EAC certified configuration must be purchased and used at the polling places.

M. Jurisdictions using the services of Hart or a third-party vendor for election preparation activities must work with Hart or the vendor to ensure that systems used for ballot definition activities are considered part of the voting system and use certified voting system components. The systems used for ballot definition must be configured securely following conditions outlined in this report and following any directives and guidance issued by the Secretary. Any data transfer between the vendor and county must be done using encrypted physical media or secure file transfer process. The file transfer and download must be tracked and audited to make sure that data has not been accessed by unauthorized personnel.

N. Jurisdictions implementing Verity Voting 2.6 must implement the use of privacy sleeves to be used by voters carrying marked ballots between the Verity Touch Writer Duo ballot marking device and Verity Scan precinct scanner.

O. Jurisdictions must work with Hart to thoroughly test and review the audio ballot instructions to ensure that the voters using an audio ballot can cast the ballot without requesting assistance.

P. Jurisdictions implementing Harty Verity Voting 2.6 must:

- Work with vendor to make sure that the audio ballot uses at the most two different voices, one for instructions and one for ballot information. If the vendor can support one voice for instructions and ballot information that would be ideal.
- Ensure that ballot instructions are as concise as possible and include only as much information as necessary, since voters will be hearing it each time a contest is selected.
- Trim recorded files as tightly as possible so that there is no lead-in or trailing silence at the beginning and ending of each recording.

Q. Jurisdictions implementing Hart Verity Voting 2.6 must ensure that the audio cue made by the Verity Scan is at an audible range for voters. The volume of the cue was noted by the accessibility examiner to be not loud enough, causing some voters to miss it.

R. The electronic voting system must be physically secured while in transit, storage, or while in use at their respective locations. Unmonitored physical access to devices can lead to compromise, tampering, and/or planned attacks.

S. Jurisdictions must implement processes and procedures involving management, monitoring and verification of seals, locks/keys, for before, during and after the election.

T. Jurisdictions must seal any unused ports on the voting system components using tamper-evident seals, even if the port is inside a locked compartment. Jurisdictions must work with Hart and use physical port-blocking plugs to close unused ports whenever possible before emplacing the tamper-evident seal. The Department also recommends using port-blocking plugs for exposed ports for all components of the voting system housed in a county office where the plugs can be removed by authorized personnel when the port is needed.

U. Jurisdictions must protect installations of any voting system components on laptops and portable devices, to prevent lost or stolen devices.

V. Jurisdictions must implement processes to gather and safekeep system logs for each component of the voting system after each election. Consistent auditing of system logs and reports is vital to maintain system transparency and to ensure that any compromise or malfunction is observed and reported in a timely manner.

W. Jurisdictions implementing Verity Voting 2.6 must ensure that the USB devices and any other removable media used for election activities are maintained with a strict chain of custody. There must be a process to manage the removable media inventory to avoid misplaced and lost media. The devices must be reformatted before use in each election. Appropriate steps must be taken to ensure that the format is a full reformat of the

USB devices.

X. Jurisdictions implementing Verity Voting 2.6 must ensure that poll worker training emphasizes the need for maintaining the strict chain of custody on USB devices (verity keys and vDrives) used at polling places. County election officials must include processes to ensure that all supplied media is returned at the end of the election day.

Y. Jurisdictions implementing Verity Voting 2.6 must work with Hart to ensure appropriate levels of training for election officials are planned on implementation. Counties must ensure that the trainings adhere to the “Minimum Training Requirements” specified in Attachment D to this document.

Z. Jurisdictions implementing Verity Voting 2.6 must include voter and poll worker training as part of the implementation plan. The training must include hands-on practice for both voters and poll workers. Specific consideration must be given to voters using assistive devices and also poll worker education to assist voters with disabilities. Refer to Attachment B, listing detailed recommendations for training during deployment noted by the Accessibility Examiner.

AA. Jurisdictions implementing Hart Verity Voting 2.6 must train poll workers to assist voters in ways that do not compromise the voter’s privacy. This might include having standard instructions for poll workers to use to guide a voter in casting their own ballot or narrating the poll worker’s actions so that the voter understands what the poll worker is doing. Refer to Attachment B, listing detailed recommendations for training during deployment noted by the Accessibility Examiner.

BB. Jurisdictions implementing Verity Voting 2.6 must work with Hart during ballot definition activities to ensure that the ballots do not contain any unique identifiers in the bar code or human readable form. This includes even sequential numbers being printed on the ballots.

CC. The full implementation of Hart Verity Voting 2.6 system includes use of COTS components. Jurisdictions must ensure that the COTS components are also

considered as voting system components and must not use them for any other purpose while being stored between elections. Any changes to the COTS components including but not limited to firmware upgrades, patching, etc., must be completed by the voting system manufacturer or per instructions issued by the voting system manufacturer. Jurisdictions must also work with Hart in the event they need to replace a COTS component that is part of the voting system. Jurisdictions must be aware that the system certification includes specific versions of all the hardware and software components, and any changes will violate the integrity of the voting system.

DD. Jurisdictions implementing Verity Voting 2.6 must consider the following during voting booth setup for serving voters requiring assistive devices identified in the full accessibility examination done on Verity 2.3:

- Voters with disabilities may have assistive technology that they use in their daily life which may need to be brought to the polling place. These technology/devices must be allowed at the polling place. The voting booth setup must account for the requirements to keep the assistive technology or personal notes that they need within reach. They may also need room to place the printed ballot on a flat surface to use personal technology such as magnifiers or text readers to verify it.
- The path for a voter to travel to the Verity Scan precinct scanner should be as easy as possible, ideally a straight line with no obstructions. The path should include ample room to turn a wheelchair if the machine is positioned with the screen facing the wall. The ADA standards suggest a minimum of 60x60 inches for this.
- The cord used to connect the tactile keypad must not interfere with the voter's ability to find and take their printed ballot.
- The voting booth must be set up so the voter's back is to a wall, so no one can walk behind them and with sufficient space to the left and right. The set up

must ensure that there is a good path for a manual or motorized wheelchair to get to the voting booth easily and the system is not too far back and that it is within reaching distance for those in a manual or power wheelchair.

Refer to Attachment B, listing detailed recommendations for deployment noted by the Accessibility Examiner.

EE. Jurisdictions can make use of the adjudication functionality to adjudicate write-ins and evaluate questionable ballots, contests or selections to determine voter intent. Any decisions made during review of the ballot must be agreed upon by a team of at least two reviewers authorized by the board of elections. The board of elections can also consult the paper ballot to assist with determinations made during adjudication. In the event of a recount, the voter-verified paper ballots must be used for the count.

FF. Hart must submit the following system education materials to the Department of State and must consent to the publication and use of the video on any websites hosted by any Pennsylvania counties and the Pennsylvania Secretary of the Commonwealth or publicly available social media platforms. The videos must be closed captioned for the visually impaired.

- A video (in an electronic format) for voters that demonstrates how to cast a vote and ballot using the Voting System.
- A video (in an electronic format) for precinct election officials that demonstrates how to set up, operate, and shut down the Voting System components on an Election Day. The video must demonstrate how to set up and operate the voting system-accessible devices for use by voters.
- A “quick reference guide” for precinct election officials to consult on Election Day. The guide must be specific to the purchasing county’s setup and use of the Voting System, including accessible options.
- A “quick reference guide” with images that demonstrates to voters how to cast

a vote. This must be provided in additional languages for any jurisdictions required to meet thresholds required by the Voting Rights Act.

GG. Hart must adhere to the following reporting requirements and submit the following to the Secretary:

- Equipment Reporting. Reported field issues or anomalies that occur in Pennsylvania or elsewhere with any piece of equipment deployed in the Commonwealth of Pennsylvania within 3 days of the occurrence;
- Advisory Notices. System advisory notices issued for any piece of equipment deployed in the Commonwealth of Pennsylvania regardless of whether the incident behind the notice occurred in Pennsylvania;
- Ownership, Financing, Employees, Hosting Location. Any changes to information on the Supplier's employees and affiliates, locations, company size and ability to provide technical support simultaneously to several counties in the Commonwealth of Pennsylvania and other jurisdictions that use its Voting System. Additionally, Hart must provide information on foreign ownership/financing, data hosting, and production for any equipment or ancillary products, including any potential conflict of interest that may have developed for employees and affiliates;
- Security Measures including cybersecurity testing and updated security risk/vulnerability assessments conducted by the Supplier or a third-party;

HH. Hart must adhere to the "Source Code and Escrow Items Obligations" specified in Attachment E to this document.

II. Hart must work with jurisdictions to ensure that the system is configured to comply with all applicable requirements of the Pennsylvania Election Code delineated in Section Article XI-A of the Pennsylvania Election Code, Sections 1101-A to 1122-A, 25 P.S. §§ 3031.1 – 3031.22.

JJ. Jurisdictions implementing the Verity Voting 2.6 and Hart must work together to implement the system under this certification and must comply with the conditions found in this report, and any directives issued by the Secretary of the Commonwealth regarding the use of this System, in accordance with Section 1105-A(a) and(b) of the Election Code, 25 P.S. § 3031.5(a) and (b). Hart must ensure that future releases of the voting system with enhanced security and accessibility features are presented for approval to the Secretary.

KK. In addition, pursuant to the Directive on Electronic Voting Systems issued by the Secretary of the Commonwealth on August 8, 2006, the Directive Concerning the Use, Implementation and Operation of Electronic Voting Systems by the County Boards of Elections issued on June 9, 2011, and Section 1105-A(d) of the Pennsylvania Election Code, 25 P.S. § 3031.5(d), this certification and approval is valid only for Verity Voting 2.6. If the vendor or a County Board of Elections makes any changes to the Verity Voting 2.6 voting system subsequent to the date of its examination, it must immediately notify both the Pennsylvania Department of State and the relevant federal testing authority or laboratory, or their successors. Failure to do so may result in the decertification of the Verity Voting 2.6 voting system in the Commonwealth of Pennsylvania.

V. Recommendations

- A. All jurisdictions implementing Verity Voting 2.6 voting system should ensure that the system is correctly set up pursuant to all the recommendations of the Directive Concerning the Use, Implementation and Operations of Electronic Voting Systems by the County Boards of Elections issued by the Secretary of the Commonwealth on June 9, 2011, and Guidance on Electronic Voting System Preparation and Security, September 2016.
- B. All jurisdictions implementing the Verity Voting 2.6 should ensure that precinct election officials and poll workers receive appropriate training and are comfortable using the system.
- C. All jurisdictions considering purchase of the Verity Voting 2.6 should review the

System Limits as mentioned in the EAC certification scope added as Attachment A to this report.

- D. The Secretary recommends that Hart and counties work with the Department on any changes to their voting equipment including, but not limited to, purchase and upgrades.
- E. Secretary recommends in-house ballot definition activities at a county location whenever possible. If an external vendor location is used, the county should implement oversight measures to ensure that election data including ballot definition files and audit logs stored on devices outside of the county are protected from unauthorized access.

VI. Conclusion

As a result of the examination, and after consultation with the Department's staff, counsel and the examiners, the Secretary of the Commonwealth concludes that the Verity Voting 2.6 can be safely used by voters at elections as provided in the Pennsylvania Election Code and meets all of the requirements set forth in the Election Code, **provided the voting system is implemented under the conditions listed in Section IV of this report.** Accordingly, the Secretary certifies Verity Voting 2.6 for use in this Commonwealth.

The Verity Touch Writer and Touch Writer Duo ballot-marking device can accommodate 15-20 voters with disabilities an hour or 30-60 voters an hour when used as the primary voting system depending on the size of the ballot. Hart recommends one Touch Writer Duo device for every 250 voters when used as the primary voting device. The Verity Scan precinct scanner is capable of scanning approximately 4-10 ballots a minute assuming continuous uninterrupted scanning, depending on ballot length. The Verity Scan precinct scanner can serve 80-120 voters per hour based on ballot length. One Verity Scan can hold 25,000 one-sheet, ballot-cast vote records.

Attachment A – EAC Certification Scope



Cert. and Scope of
Conformance Verity



United States Election Assistance Commission

Certificate of Conformance

Hart Verity Voting 2.6



The voting system identified on this certificate has been evaluated at an accredited voting system testing laboratory for conformance to the *Voluntary Voting System Guidelines Version 1.0 (VVSG 1.0)*. Components evaluated for this certification are detailed in the attached Scope of Certification document. This certificate applies only to the specific version and release of the product in its evaluated configuration. The evaluation has been verified by the EAC in accordance with the provisions of the *EAC Voting System Testing and Certification Program Manual* and the conclusions of the testing laboratory in the test report are consistent with the evidence adduced. This certificate is not an endorsement of the product by any agency of the U.S. Government and no warranty of the product is either expressed or implied.

Product Name: Verity Voting

Model or Version: 2.6

Name of VSTL: SLI Compliance

EAC Certification Number: HRT-VERITY-2.6

Date Issued: April 20, 2021

Mona Harrington

Executive Director

Scope of Certification Attached

Manufacturer:	<i>Hart InterCivic</i>	Laboratory:	<i>SLI Compliance</i>
System Name:	<i>Verity Voting 2.6</i>	Standard:	<i>2005 VVSG</i>
Certificate:	<i>HRT-Verity-2.6</i>	Date:	<i>04/20/2021</i>



Scope of Certification

This document describes the scope of the validation and certification of the system defined above. Any use, configuration changes, revision changes, additions or subtractions from the described system are not included in this evaluation.

Significance of EAC Certification

An EAC certification is an official recognition that a voting system (in a specific configuration or configurations) has been tested to and has met an identified set of Federal voting system standards. An EAC certification is **not**:

- An endorsement of a Manufacturer, voting system, or any of the system's components.
- A Federal warranty of the voting system or any of its components.
- A determination that a voting system, when fielded, will be operated in a manner that meets all HAVA requirements.
- A substitute for State or local certification and testing.
- A determination that the system is ready for use in an election.
- A determination that any particular component of a certified system is itself certified for use outside the certified configuration.

Representation of EAC Certification

Manufacturers may not represent or imply that a voting system is certified unless it has received a Certificate of Conformance for that system. Statements regarding EAC certification in brochures, on Web sites, on displays, and in advertising/sales literature must be made solely in reference to specific systems. Any action by a Manufacturer to suggest EAC endorsement of its product or organization is strictly prohibited and may result in a Manufacturer's suspension or other action pursuant to Federal civil and criminal law.

System Overview:

The **Verity Voting 2.6** system represents a set of software applications for pre-voting, voting and post-voting election project activities for jurisdictions of various sizes and political division complexities.

- **Verity Voting 2.6** functions include: Defining the political divisions of the jurisdiction and organizing the election with its hierarchical structure, attributes and associations.
- Defining the election events with their attributes such as the election name, date and type, as well as contests, candidates, referendum questions, voting locations and their attributes.
- Preparing and producing ballots for polling place and absentee voting or by mail voting.
- Preparing media for precinct voting devices and central count devices.

- Configuring and programming the **Verity Scan** digital scanners for marked paper ballots and **Verity Touch Writer** printed vote records.
- Configuring and programming the **Verity Touch Writer** BMD devices.
- Configuring and programming the **Verity Controller** with **Verity Touch Writer Duo** BMD devices.
- Configuring and programming the **Verity Touch Writer Duo Standalone** BMD devices.
- Configuring and programming the **Verity Print** on-demand ballot production device.
- Transmission of the election results via **Verity Relay**.
- Producing the election definition and auditing reports.
- Providing administrative management functions for user, database, networking and system management.
- Import of the Cast Vote Records from **Verity Scan** devices and **Verity Central**.
- Preview and validation of the election results.
- Producing election results tally according to voting variations and election system rules.
- Producing a variety of reports of the election results in the desired format.
- Publishing of the official election results. Auditing of election results including ballot images and log files.

Verity Scan is a digital scanning device (tabulator) that is used in conjunction with an external ballot box. The unit is designed to scan marked paper ballots or Verity Touch Writer Duo printed vote records, interpret and record voter marks on the marked paper ballot or record voter selections on the printed vote records, and deposit into the secure ballot box.

Verity Touch Writer is a standalone Ballot Marking Device (BMD) which also includes an Audio Tactile Interface (ATI). Touch Writer allows voters who cannot hand-mark a paper ballot to generate a machine-readable and human readable paper ballot, based on vote selections made through the accessible electronic interface.

The **Verity Touch Writer Duo** is a daisy chained configuration of a **Verity Controller** device configured with up to twelve **Verity Touch Writer Duo** BMD devices, which allows voters to utilize the touchscreen or optional Audio Tactile Interface to generate a machine-readable and human readable printed vote record, based on vote selections made.

The **Verity Touch Writer Duo Standalone** is a standalone Ballot Marking Device (BMD) which allows voters to utilize the touchscreen or optional Audio Tactile Interface to generate a machine-readable and human readable printed vote record, based on vote selections made.

Verity Print is an on-demand ballot production device for unmarked paper ballots.

Verity Election Management allows users with the Administrator role to import and manage election definitions. Imported election definitions are available through the Elections chevron in Build. Users can also delete, archive, and manage the election definitions.

Verity User Management enables users with the correct role and permissions to create and manage user accounts within the **Verity Voting** system for the local workstation in a standalone configuration, or for the network in a networked configuration.

Verity Desktop enables users, with the correct roles, to set the workstations' date and time, gather **Verity** application hash codes (in order to validate the correctness of the installed applications), and access to the Windows desktop.

Verity Data provides the user with controls for entering and proofing data and audio. **Verity Data** also performs validation on the exported information to ensure that it is ready for use in **Verity Build**.

Verity Build opens the election to proof data, view reports, and print ballots, and allows for configuring and programming the **Verity Scan** digital scanners, **Verity Touch Writer** BMD, **Verity Controller/Touch Writer Duo** BMD devices, and **Verity Print** as well as producing the election definition and auditing reports.

Verity Central is a high-speed, central digital ballot scanning system used for high-volume processing of ballots (such as vote by mail). Verity Central is based on COTS scanning hardware coupled with custom **Hart**-developed ballot processing application software which resides on an attached workstation.

Verity Count is an application that tabulates election results and generates reports. **Verity Count** can be used to collect and store all election logs from every **Verity** component/device used in the election, allowing for complete election audit log reviews.

Verity Relay provides remote transmission capability to the **Verity Voting 2.6** system. Utilizing an optional modem with **Verity Scan**, at close of polls, results are transmitted from the polling place device to the **Verity Relay** workstation.

Verity AutoBallot is an optional barcode scanner kit for **Verity Controller**, **Verity Print**, and **Verity Touch Writer** that allows air-gapped integration between an e-pollbook check-in process and the task of selecting the ballot style for the voting system.

Certified System before Modification (If applicable):

Verity Voting 2.5

Anomalies and/or Additions addressed in Verity Voting 2. 6:

- Two anomalies were corrected:
 - 1) In Verity Central, a user was unable to import a Certified Write-in Candidates list that had just been exported.

2) In Verity Count, Voting types were not following sequential order in the Reporting Options Screen.

- The following additions were made:
 - **Proposition text wrapping**
Affected Software and Devices: Verity Data. If the proposition text of a contest does not fit entirely in the remaining space of a column, the system now supports wrapping proposition text to adjacent columns.
 - **Ballot Layout Validations**
Affected Software and Devices: Verity Data. Verity Data now includes ballot validation for propositions that do not fit on a single page. Validation for propositions that do not fit in a single column is removed.
 - **Column forces by precinct-split**
Affected Software and Devices: Verity Data. Verity Data now allows users to apply column and page forces to contest by precinct-split.
 - **No candidates have filed**
Affected Software and Devices: All. Support has been added for contests where no candidates have filed.
 - **Concurrent write-in assignment**
Affected Software and Devices: Verity Count. Verity Count now supports the simultaneous adjudication of write-in within a single task on multiple Count Client workstations.
 - A new “Refresh” button and “Last Updated” time indicator are added.
 - Adds a new contest selection dropdown experience, that will show all contest that are currently checked out by users.
 - New button “Post” added to the election dashboard, to the “write-in resolution” section of the screen. The post button captures the entire write in resolution state of the task and moves it to become available for reporting.
 - **Support for 10 voting types**
Affected Software and Devices: Verity Count. Now supports 10 voting types system-wide.
 - A new “Results by Category” report supporting up to 10 Voting Types.
 - The following Count reports and exports now display up to 10 voting types
 - Cumulative
 - Precinct
 - District
 - Canvass
 - HTML Cumulative

- HTML Precinct
 - HTML Canvass
 - Detailed Vote Total export
-
- **Verity Count MVR Improvement**
Affected Software and Devices: Verity Count. Verity Count supports batch subtraction of records during a Manual Vote Recording session. Supported use cases may include changing election data source or other error corrections.

 - **Configuration Changes to Devices**
The Verity series of Direct Recording Electronic (DRE) devices are not included in the Verity Voting 2.6 configuration. The DRE devices include Verity Touch and Verity Touch with Access.

 - **Configuration Changes to Workstations**
Verity Voting 2.6 only supports workstation models that are equipped with 64GB of memory. As such, the Hewlett Packard Z230 workstation model is not supported in this configuration.

Mark definition:

System supports marks that cover a minimum of 4% of the rectangular marking area.

Tested Marking Devices:

System supports Black and Blue ballpoint pens; testing was performed with black, blue, dark blue, pink, light green, green, orange, and red pens, as well as #2 pencil lead.

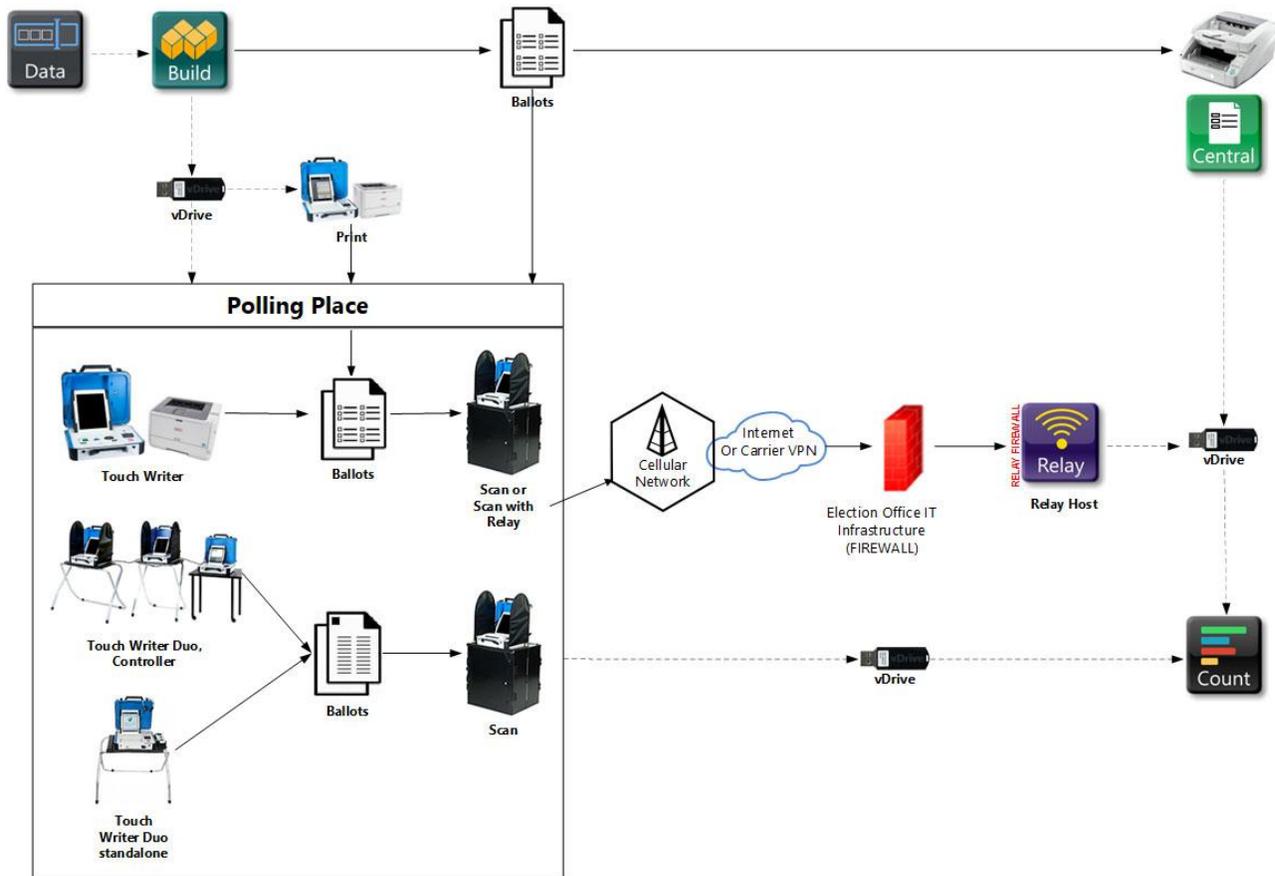
Language capability:

System supports English, Spanish, Chinese, Japanese, Korean, Khmer, Thai, Vietnamese, Tagalog, Ilocano, Haitian Creole, and Hindi.

Components Included:

This section provides information describing the components and revision level of the primary components included in this Certification.

- System Diagram



Proprietary Software

System Component	Software or Firmware Version	Hardware Version	Operating System or COTS	Comments
Verity Data	2.6.0			Data management software
Verity Build	2.6.0			Election definition software
Verity Central	2.6.0			High speed digital scanning software
Verity Count	2.6.0			Tabulation and reporting software
Verity Relay	2.6.0			Data transmission software (receiving station)
Verity Print	2.6.0			On-demand ballot printing device firmware
Verity Scan	2.6.0			Digital scanning device firmware

Verity Touch Writer	2.6.0			Ballot marking device
Verity Touch Writer Duo	2.6.0			Ballot marking device, with internal COTS ballot summary printer and optional audio tactile interface
Verity Touch Writer Duo Standalone	2.6.0			Ballot marking device, with internal COTS ballot summary printer and optional audio tactile interface
Verity Controller	2.6.0			Polling place management device

COTS Software and Firmware

Description	Version
Verity Data, Build, Central, Count, Relay, Print, Scan – Paper Ballot Scanner (additional item below), Touch Writer – Electronic BMD Device, Touch Writer Duo – Electronic BMD Device, Controller.	
Microsoft Windows 10 Enterprise 2019 LTSC	10.0.17763
Microsoft SQL Server Standard 2017	14.0.1000.169
McAfee Application Control for Devices (McAfee Solidifier)	8.2.1-143
Verity Scan – Paper Ballot Scanner	
Nuance Western OCR, Desktop, OEM	V20

Hardware

Description	Version
Verity Print – Ballot Printer	3005356 Rev E
Verity Print – Ballot Printer	3005856 Rev B
Verity Scan – Paper Ballot Scanner	3005350 Rev I
Verity Scan – Paper Ballot Scanner	3005800 Rev B
Verity Touch Writer – Electronic BMD Device	3005352 Rev H
Verity Touch Writer – Electronic BMD Device	3005852 Rev B
Verity Touch Writer Duo – Electronic BMD Device	3005700 Rev B
Verity Touch Writer Duo Standalone – Electronic BMD Device	3005730 Rev A
Verity Controller – Networked Centralized Management Device	3005351 Rev E
Verity Controller – Networked Centralized Management Device	3005825 Rev B

COTS Equipment

Description	Version
Verity Data, Build	
Verity Data and Build Applications and Workstation Kit <ul style="list-style-type: none"> HP Z4 G4 Workstation HP Z230 and Z240 Workstations supported for existing customers only 	A
OKI Data C831dn Color Printer for existing customers only	N35100A
OKI Data C844dn Color Printer	N35301A
OKI Data C911dn color Printer for existing customers only	N36100A
OKI Data C931e Color Printer	N36100A

OKI Data B432dn Mono Report and Ballot Printer	N22500A
OKI Data B431d Mono Report Printer for existing customers only	N22202A
8-port Ethernet Switch	1405-8GV3
Vinpower Digital USB Duplicator 7-targets	USBShark-7T-BK
Vinpower Digital USB Duplicator 23-targets	USBShark-23T-BK
Verity Central	
Verity Central Applications and Workstation Kit <ul style="list-style-type: none"> HP Z4 G4 Workstation HP Z230 and Z240 Workstations supported for existing customers only 	A
Canon DR-G1100 High-Speed Scanner	M111181
Canon DR-G1130 High-Speed Scanner	M111171
Canon DR-G2110 High-Speed Scanner	6130030
Canon DR-G2140 High-Speed Scanner	6130020
OKI Data B432dn Mono Printer Report Printer	N22500A
OKI Data B431d Mono Report Printer for existing customers only	N22202A
8-port Ethernet Switch	1405-8GV3
Verity Count	
Verity Count Applications and Workstation Kit <ul style="list-style-type: none"> HP Z4 G4 Workstation HP Z230 and Z240 Workstations supported for existing customers only 	A
OKI Data B432dn Mono Printer Report Printer	N22500A
OKI Data B431d Mono Report Printer for existing customers only	N22202A
HP 8-port Ethernet Switch	1405-8GV3
Verity Relay	
Verity Relay Applications and Workstation Kit <ul style="list-style-type: none"> HP Z4 G4 Workstation HP Z240 Workstation supported for existing customers only 	A
OKI Data B432dn Mono Printer Report Printer	N22500A
OKI Data B431d Mono Report Printer for existing customers only	N22202A
HP 8-port Ethernet Switch	1405-8GV3
Verity Print	
OKI Data C831dn Color Printer for existing customers only	N35100A
OKI Data B432dn Mono Printer Report Printer	N22500A
OKI Data C844dn Color Printer	N35301A
OKI Data B431d Mono Report Printer for existing customers only	N22202A
Optional AutoBallot Barcode Scanner Kit Includes the following 2d barcode scanner: <ul style="list-style-type: none"> Hart part number: 1003672 Motorola/Zebra part number: DS4308 or DS4608 	C
Verity Scan – Paper Ballot Scanner	
Verity Ballot Box	B
Optional Relay Accessory Kit (4G LTE Cat-M1) Includes the following COTS modem <ul style="list-style-type: none"> Hart part number: 1005248 MultiTech part number: MTD-MNA1-2.0 	A
Verity Touch Writer – Electronic BMD Device	
OKI Data B432dn Mono Printer Report Printer	N22500A

OKI Data B431d Mono Report Printer for existing customers only	N22202A
Accessible Voting Booth	D
Optional AutoBallot Barcode Scanner Kit Includes the following 2d barcode scanner: <ul style="list-style-type: none"> Hart part number: 1003672 Motorola/Zebra part number: DS4308 or DS4608 	C
Headphones <ul style="list-style-type: none"> Brand: V7, part number HA300-2NP or HA310-2NP 	2005230
Verity Touch Writer Duo – Electronic BMD Device	
Brother PJ700 Series Thermal Printer	PJ723
Accessible Voting Booth with ATI Tray	D
Standard Voting Booth	D
Optional Detachable ATI Kit	A
Optional headphones for ATI Kit Brand: V7, part number HA300-2NP or HA310-2NP	C
Verity Touch Writer Duo Standalone– Electronic BMD Device	
Brother PJ700 Series Thermal Printer	PJ723
Accessible Voting Booth with ATI Tray	D
Standard Voting Booth	D
Optional Detachable ATI Kit	A
Optional headphones for ATI Kit Brand: V7, part number HA300-2NP or HA310-2NP	C
Verity Controller	
Optional AutoBallot Barcode Scanner Kit Includes the following 2d barcode scanner: <ul style="list-style-type: none"> Hart part number: 1003672 Motorola/Zebra part number: DS4308 or DS4608 	C

System Limitations

This table depicts the limits the system has been tested and certified to meet.

Element	Testing Limit/Requirement Z240 or Z4 G4 64GB Systems (does not include Data/Build/Count combined system)	Testing Limit/Requirement Data/Build/Count combined system)
Precincts	3,000	2,000
Splits per Precinct	20	20
Total Precincts + Splits in an election	3,000	2,000
Districts for voting devices and applications	400	75
Parties in a General Election	24	24
Parties in a Primary Election	10	10
Contests in an election	2,000	200
Choices in a single contest	300	75

Total contest choices (voting positions) in an election	5,000	600
Max length of choice name	100 characters	100 characters
Max write-in length	25 characters	25 characters
Voting Types	10	10
Max polling places per election	3,050	1,200
Max devices per election	N/A	N/A
vDrive capacity – Scan voting device	25,000 sheets per vDrive	25,000 sheets per vDrive
vDrive capacity – Verity Central	25,000 sheets per vDrive	25,000 sheets per vDrive
Number of voters definable per election	2,500,000	1,000,000
Number of total ballots cast per election	1,750,000	1,000,000
Max number of sheets per ballot	4 sheets	4 sheets
Max number of sheets – Verity Scan	25,000	25,000
Max number of CVRs – Verity Count	7,000,000	7,000,000
Ballot Sizes	8.5"x11", 8.5"x14", 8.5"x17", 8.5"x20", 11"x17" (Central only)	8.5"x11", 8.5"x14", 8.5"x17", 8.5"x20", 11"x17" (Central only)
Number of languages in a single election (including English)	12	12

Functionality

2005 VVSG Supported Functionality Declaration

Feature/Characteristic	Yes/No	Comment
Voter Verified Paper Audit Trails		
VVPAT	No	
Accessibility		
Forward Approach	Yes	
Parallel (Side) Approach	Yes	
Closed Primary		
Primary: Closed	Yes	Supports standard closed primary and modified closed primary
Open Primary		
Primary: Open Standard (provide definition of how supported)	Yes	Open Primary
Primary: Open Blanket (provide definition of how supported)	Yes	General "top two"
Partisan & Non-Partisan:		
Partisan & Non-Partisan: Vote for 1 of N race	Yes	
Partisan & Non-Partisan: Multi-member ("vote for N of M") board races	Yes	
Partisan & Non-Partisan: "vote for 1" race with a single candidate and write-in voting	Yes	

Partisan & Non-Partisan “vote for 1” race with no declared candidates and write-in voting	Yes	
Write-In Voting:		
Write-in Voting: System default is a voting position identified for write-ins.	No	By default, the number of write-ins available in a contest is zero, users may increment as necessary
Write-in Voting: Without selecting a write in position.	No	
Write-in: With No Declared Candidates	Yes	
Write-in: Identification of write-ins for resolution at central count	Yes	
Primary Presidential Delegation Nominations & Slates:		
Primary Presidential Delegation Nominations: Displayed delegate slates for each presidential party	Yes	
Slate & Group Voting: one selection votes the slate.	Yes	
Ballot Rotation:		
Rotation of Names within an Office; define all supported rotation methods for location on the ballot and vote tabulation/reporting	Yes	Rotation by precinct and precinct split
Straight Party Voting:		
Straight Party: A single selection for partisan races in a general election	Yes	
Straight Party: Vote for each candidate individually	Yes	
Straight Party: Modify straight party selections with crossover votes	Yes	
Straight Party: A race without a candidate for one party	Yes	
Straight Party: “N of M race (where “N”>1)	Yes	
Straight Party: Excludes a partisan contest from the straight party selection	Yes	
Cross-Party Endorsement:		
Cross party endorsements, multiple parties endorse one candidate.	Yes	
Split Precincts:		
Split Precincts: Multiple ballot styles	Yes	
Split Precincts: P & M system support splits with correct contests and ballot identification of each split	Yes	
Split Precincts: DRE matches voter to all applicable races.	Yes	
Split Precincts: Reporting of voter counts (# of voters) to the precinct split level; Reporting of vote totals is to the precinct level	Yes	
Vote N of M:		
Vote for N of M: Counts each selected candidate, if the maximum is not exceeded.	Yes	
Vote for N of M: Invalidates all candidates in an overvote (paper)	Yes	
Recall Issues, with options:		
Recall Issues with Options: Simple Yes/No with separate race/election. (Vote Yes or No Question)	Yes	

Recall Issues with Options: Retain is the first option, Replacement candidate for the second or more options (Vote 1 of M)	Yes	
Recall Issues with Options: Two contests with access to a second contest conditional upon a specific vote in contest one. (Must vote Yes to vote in 2 nd contest.)	Yes	
Recall Issues with Options: Two contests with access to a second contest conditional upon any vote in contest one. (Must vote Yes to vote in 2 nd contest.)	Yes	
Cumulative Voting		
Cumulative Voting: Voters are permitted to cast, as many votes as there are seats to be filled for one or more candidates. Voters are not limited to giving only one vote to a candidate. Instead, they can put multiple votes on one or more candidate.	Yes	
Ranked Order Voting		
Ranked Order Voting: Voters can write in a ranked vote.	Yes	
Ranked Order Voting: A ballot stops being counting when all ranked choices have been eliminated	N/A	Tabulation rules are unique per jurisdiction
Ranked Order Voting: A ballot with a skipped rank counts the vote for the next rank.	N/A	Tabulation rules are unique per jurisdiction
Ranked Order Voting: Voters rank candidates in a contest in order of choice. A candidate receiving a majority of the first choice votes wins. If no candidate receives a majority of first choice votes, the last place candidate is deleted, each ballot cast for the deleted candidate counts for the second choice candidate listed on the ballot. The process of eliminating the last place candidate and recounting the ballots continues until one candidate receives a majority of the vote	N/A	Tabulation rules are unique per jurisdiction
Ranked Order Voting: A ballot with two choices ranked the same, stops being counted at the point of two similarly ranked choices.	Yes	
Ranked Order Voting: The total number of votes for two or more candidates with the least votes is less than the votes of the candidate with the next highest number of votes, the candidates with the least votes are eliminated simultaneously and their votes transferred to the next-ranked continuing candidate.	N/A	Tabulation rules are unique per jurisdiction
Provisional or Challenged Ballots		
Provisional/Challenged Ballots: A voted provisional ballots is identified but not included in the tabulation, but can be added in the central count.	Yes	
Provisional/Challenged Ballots: A voted provisional ballots is included in the tabulation, but is identified and can be subtracted in the central count	Yes	
Provisional/Challenged Ballots: Provisional ballots maintain the secrecy of the ballot.	Yes	
Overvotes (must support for specific type of voting system)		

Overvotes: P & M: Overvote invalidates the vote. Define how overvotes are counted.	Yes	If the system detects more than the valid number of marks in a contest, it is counted as an overvote
Overvotes: DRE: Prevented from or requires correction of overvoting.	Yes	
Overvotes: If a system does not prevent overvotes, it must count them. Define how overvotes are counted.	Yes	If the system detects more than the valid number of marks in a contest, it is counted as an overvote
Overvotes: DRE systems that provide a method to data enter absentee votes must account for overvotes.	Yes	
Undervotes		
Undervotes: System counts undervotes cast for accounting purposes	Yes	
Blank Ballots		
Totally Blank Ballots: Any blank ballot alert is tested.	Yes	
Totally Blank Ballots: If blank ballots are not immediately processed, there must be a provision to recognize and accept them	Yes	
Totally Blank Ballots: If operators can access a blank ballot, there must be a provision for resolution.	Yes	
Networking		
Wide Area Network – Use of Modems	Yes	With optional Verity Relay
Wide Area Network – Use of Wireless	Yes	With optional Verity Relay
Local Area Network – Use of TCP/IP	Yes	
Local Area Network – Use of Infrared	No	
Local Area Network – Use of Wireless	No	
FIPS 140-2 validated cryptographic module	Yes	
Used as (if applicable):		
Precinct counting device	Yes	
Central counting device	Yes	

Attachment B – Accessibility Examination Findings and Recommendations

(The attachment contains observations from the complete accessibility examination and included Touch Writer Ballot Marking Device even though not certified as part of this campaign.)

A) Top positives



Hart Verity Voting
2.3 Top positives.pdf

B) Top problems



Hart Verity Voting
2.3 Top problems.pdf

C) Special Discussion



Hart Verity Voting
2.3 Special Discussic

D) All observations from Accessibility Examination



Hart Verity Voting
2.3 All observations.

E) Additional Recommendations for Deployment from Accessibility Examiner report



Hart Verity Voting
2.3 Recommendation

Top positives

The expert examination, voter experiences, and poll worker sessions recognized several positives of these voting systems. Because the voting experience is virtually identical for both the Touch Writer and the Duo, unless otherwise noted, no distinctions will be made between them.

Independent and private voting

All voters were able to learn the system quickly and complete their ballots independently, once the facilitator provided them with the appropriate accessibility features. No one found the system so difficult or frustrating that they were unable to vote, and most stated that the system would help other voters with disabilities as well.

The system had good privacy measures and voters also agreed that their experience in a typical voting session would be relatively private on this machine.

- The vendor provided voting booths each included privacy shields on either side of the ballot marking device, controller (if applicable), and scanner.
- The touchscreen is at the back of the machine, near the hinge of the clamshell case. Because it was deeper within the voting booth, it was well masked by the privacy shields. This presented a problem for voters in wheelchairs, though. Most were unable to reach far enough over the front of the unit to use the touchscreen and had to use the tactile keypad. More can be found about this issue in the next section.
- The touchscreen itself could only be viewed clearly from directly in front of it. As voters moved off to the side, the screen was shielded by a limited viewing angle.
- The vendor included a third-party privacy sleeve that all three examiners agreed was the best implementation of a privacy sleeve we had experienced. It was a folded piece of cardstock, like many others; however, it had a roughly 4 x 0.5-inch cut out a third of the way down the spine and another roughly 15 x 1.5-inch jut out along the right-hand side. This allowed voters with disabilities to place their ballot in the sleeve.

Some were then able to feed the ballot in accurately because the sleeve helped manage the angle. Others still needed assistance, but a poll worker could feed the ballot into the scanner using the left-hand cut out without seeing the ballot at all.

This privacy sleeve can be found at <https://printingsystems.us/product/168>. The link above is only provided for informational purposes and is not an endorsement or promotion by these examiners, Misericordia University, or the Center for Civic Design.

Access features easily learned and helpful

As voters explored the access features, they seemed to learn them relatively easily. Most of the voters use similar assistive devices daily or when they currently vote.

All voters found the default text size to be sufficient. Our participant voters all had either normal vision or no usable vision. The single voter with low-vision chose not to try to read the screen with large print, and used the audio feedback instead.

For voters with low vision, the range from normal to large text was great enough that those with usable, but limited vision should be able to use the screen without difficulty.

The MOVE wheel is unique to the Hart systems, and it was generally well received. It has one half-sphere-shaped divot near the edge, where the voter can use a finger to turn it. Alternatively, there are raised spokes radiating from the hub that can be used to turn it as well.

- All three users with very limited use of their hands were able to vote with the tactile keypad, when they normally would require a dual switch device. One voter found the interaction similar to gaming interfaces and was able to complete the voting session very quickly.
- One blind voter who struggled to use the wheel tried the dual-switch buttons instead. This accessibility option worked well for her and she was able to complete her ballot successfully.

The blind voter's difficulty using the MOVE wheel was a good lesson that poll workers should give disabled voters privacy, but keep an eye on them to ensure their voting experience is smooth. They should be well-briefed in all accessibility devices, how they work, and that voters may struggle with one type of device but be successful with another.

Other limitations of the MOVE wheel can be found in the Special Discussion section.

The Duo requires the voter to enter a poll worker-issued code that initiates the proper ballot. The tactile device is active for this screen, which was a pleasant surprise to examiners and voters. However, the code is printed on paper, and is not accessible for blind voters, who would have to be told the code and memorize it (this would not be a barrier for most successful blind individuals). They could also use personal assistive technology (AT) to read the code in the voting booth.

Both poll worker groups reported that the access features would help voters who already visit their location on Election Day. They also agreed that these features would likely assist other voters with disabilities that do not currently come to the polls on Election Day.

Helpful alerts and candidate selections language

The system alerts and messages are generally good and voters did not react negatively to any of them. Hart's straight party implementation, text size changes, and cursor visibility when using assistive devices did fall short in some areas. See the next section for more information.

- **Overvote protection.** When voters attempted to select too many choices in a contest, the system displayed a full-screen alert. This alert informed the voter that the first selected choice would be removed and replaced with the choice they touched last. While the examiners found this alert style unusual and unique, it seemed to be effective, as most voters understood the message and knew how to proceed.

Some voters, however, felt that the voting machine was making choices for them, and that the machine might make other choices without informing them. Most concerned voters felt that they could go back to

the contest and make alternative choices, though some commented that with only an “OK” button to choose from, they would prefer to have the ability to reject the action.

- **Choices remaining within a contest.** On entering each contest, the system announces, “this is ballot item #. The total number of items on the ballot is #.” The second part of this statement was redundant, since it never changed. Voters felt that the same information could have been expressed as, “this is ballot item # of #.”

They also suggested that the number of candidates be added to the information, such as, “there are # candidates in this contest.”

For each contest, the screen displays and the audio reads the “Vote for N” message, then announces that, “the remaining number of choices you can mark is #.” Some, but not all, voters found and understood this message, while others were not able to link the meaning to number of candidates selected, either by the straight party selection or manually selected out of view.

When a straight-party is selected, the system announces that, “the number of choices you can mark is zero.” This is accurate, but not informative to voters who did not understand that the selections were made through their straight party selection.

- **Review screen.** On the review screen, the system adequately alerts voters within each contest when they have not selected as many choices as allowed or when they leave a contest blank.
- **Printing the ballot.** The system and the printer communicate well together. After voters selected the “PRINT” button, the system continually displays and announces, for audio users, “Your ballot is printing.” This continues until the ballot has fully printed, when the message changes to “Your ballot has printed.” This is very helpful for two reasons:

The printer takes some time to warm up and begin printing. We were not able to determine whether this would be true during a normal election, but would certainly be true if the machine was used only for voters with

disabilities. The repeated message was helpful because voters might think there is a problem when the printer does not visually or audibly react immediately.

Voters who cannot see the printer may not know when their ballot has printed successfully. The timely change in messaging lets them know they can retrieve their ballot. This was particularly important for double-sided ballots on the Verity Touch.

Consistent behaviors and easy navigation

The system navigation and screen behaviors were good and consistent during the entire voting experience. Voters did not report any confusion when switching selecting or deselecting buttons or when navigating through the ballot.

For tactile keypad users, the order in which the system selected navigational and system settings buttons required learning, but was consistent throughout.

The only exception was the review screen. When voters made changes on the review screen, the system would take them to that specific contest, which is good. However, it did not return them automatically to the review screen when the voter selected “NEXT” at the bottom of the screen. It merely moved them to the next contest of the initial voting experience, which was confusing to a few voters—especially those who could not see the screen for contextual reference. Only one voter found the “REVIEW YOUR CHOICES” button without being prompted. All voters were able to get back to the review screen by selecting “NEXT” enough times.

On return to the review screen, whether by the “REVIEW YOUR CHOICES” button or multiple Next selections, the voter is placed at the top of the ballot, rather than the contest from which they left. They are then required to move down the ballot manually to continue the review.

Also, when a contest is left blank, the navigational button at the bottom-right of the screen changes from a blue “NEXT” button to a grey “SKIP” button. The language used on both systems is understandable and non-coercive. Voters

understood these messages and only one voter was confused by it. None reported that they felt compelled to make additional selections.

Additional positive observations can be found in the “All Observations” section of this report.

Top problems

The two Hart Verity systems were well received by voters, and examiners did not find any glaring issues that would prevent a voter from successfully casting a ballot privately and independently. The first two problems below are the most significant. The other issues are treated as repeated annoyances that were observed during the expert examination and voter or poll worker sessions.

Again, unless otherwise noted, this Top Problems section will treat both systems as one.

1. Silent/Hidden selection and deselection

There were three elements of silent and/or hidden selection and de-selection on the Hart system that voters found confusing. In most cases, voters were able to mark their ballot as instructed through trial and error, but when switching from straight party to manual selections under the Pennsylvania Method, they did not notice changes made by the system and might vote in a way that does not match their intent.

- **Destructive candidate deselection when changing a straight party contest**

After making a straight party choice, if voters wanted to vote for candidates other than the straight party selections, the system automatically deselects all of the other pre-marked candidates, leaving the chosen candidate as the only one selected. In a contest with a short list of candidates, this behavior, dictated by the PA Method, caused confusion, but with persistence voters were able to select the candidates specified in the test instructions.

For example, when the voters were asked to vote for just one of the three automatically selected candidates, some attempted to deselect an unwanted candidate by selecting that candidate. Because of the interpretation of the PA Method, this resulted in confirming the vote for that candidate instead of deselecting that candidate, as the voters stated they had expected. Where changes were evident, the voters were able to

correct the error and vote as instructed. (Please see more about candidate selection in the next section.)

- **When the contest was long, candidates were often de-selected on a different screen, with no notification from the system.** For example, in a contest of 20 candidates, if a voter chose the Republican straight party option, but wanted to vote for the Green party candidates, the voter would need to scroll to the bottom of the list, forcing the pre-marked votes out of view. Once, the voter selected the desired candidate, the pre-marked votes are deselected out of view, and no alert is provided to notify the voter. For voters relying solely on the audio, no deselection is voiced at any time no matter the contest length.

Voters may be able to indirectly determine that choices have been deselected by referring to the number of choices that remain instructions. This is constantly visible on the screen, but the audio only voices it after a selection is made.

- **Voters must select a pre-marked option twice to deselect it.** For sighted voters, this was less of an issue. However, for audio users, it took some trial and error to understand why the initial selection did not turn off a pre-marked candidate.

Why is this a problem?

The system relies on voters perceiving the change in selections and understanding why those changes have happened. This is a problem because:

- Voters should have control of all selections.
- Off-screen actions force all voters to problem solve. This is worse for voters using the audio format or a dual switch because navigation is more difficult.
- Voters with cognitive disabilities may be unable to understand what has happened when the interface is unpredictable and/or inconsistent.
- If a voter has to ask for assistance in the middle of the ballot, their privacy and independence are compromised.
- In several cases when test voters were asked about the state of their ballot after such deselection, they thought that candidates were still

marked who were not. When prompted to go back and check, they were able to correct the deselection, but without the prompt, it is likely that they would have cast ballots not marked as they intended.

Recommendations

There are two defenses against the silent deselection issue for some voters. Voters have the opportunity to review their choices before printing their ballot. And, most voters can review their printed ballot before casting it. Not all voters will be protected by these two options.

While the machines must comply with the Pennsylvania Method of straight party voting, there are ways to fully inform the voter of selection and deselection changes. For example:

- Create meaningful visual and audio feedback messages and confirmation processes to tell voters what is happening—including the number and names of the candidates being deselected. No selection or deselection should ever take place without explicit action or confirmation from the voter. Language should be included like: “If you do X, these voters will be deselected” or “Are you sure you want to...”
- Be consistent and toggle all selections on and off when touched or selected with the tactile keypad, including selections made when the straight party option is active. This is consistent with how selection and deselection works in general and is not destructive.
- Counties can make sure poll workers are aware of these system behaviors so they can answer questions from voters. This especially applies to voters with disabilities. Also, counties can inform voters about the straight party behavior through public information campaigns, system demonstrations, and Election Day signage.

2. Audio quality and instructions

What happened?

Voters reported a number of problems with the audio quality and instructions.

- **Long, wordy, and repetitive.** Audio voters universally reacted negatively to the length of the instructions on each screen. At the start of each

contest or whenever the voter reenters a contest, the system replays the same very detailed voting instructions. Then, it announces the current contest number and how many contests there are in total. Several of our voters began mimicking this announcement as it was made.

- **Unhelpful information.** As mentioned above, the same instructions were repeated over and over, along with the contest progression information. Voters reported that after they learned the system, they no longer needed the details, and they wished the contest count was a number of candidates in each contest.
- **Recording quality.** Overall, voters liked the tone of the voices used for the instructions. The system used recordings of actual human speech for the instructions and ballot information. Many voting systems use a synthesized voice. It seems that most instructions are pre-recorded and in the same voice. The rest of the ballot information seems to be cobbled together from different recordings by different people. For example, if the system were reading the date, different voices would read the months, days, and year, for a total of three voices. It is unclear to the examiners if this was intentional or if this is just how the test ballot was created. In places, recorded announcements were preceded by vocal scraps and clicks, indicating poor editing practices. While the final volume was approximately the same for each of the voices used in the audio track, the background noise level and distortion differed markedly, affecting the intelligibility of the voice, and distracted the voters.
- **Playback speeds.** Voters could choose the speed of the recordings: Slow, Normal, or Fast. The higher speed seemed to be reached by simply slicing out segments of the recording (e.g. every third .05 seconds). The slicing interval was fairly long and not keyed to vocal content, which made it sound very choppy. The normal speed was easily understandable, but also very slow for an instructional voice. This was helpful to those voters that use little to no audio assistive devices, but frustrating to voters (typically blind voters) used to faster audio. None of the voters chose slow, all but one voter chose normal, and most voters disliked the fast speed.
- **Playback content.** Experienced users of screen reading technology often read quite fast. Our test voters felt that even the “Fast” voice was painfully slow and choppy. When the voice does not pronounce names clearly, there can be confusion about names that sound similar. Several easily-

confused names are included in the test ballot, and participants who are more expert with screen readers mentioned that it would be ideal to have an option to spell-out a name.

- **Pauses.** In addition to the recording speed, the system seemed to insert a number of pauses before and after each section of audio. For example, in reading a candidate's name, the system would have a long pause between the candidate name and party. There was also a significant delay from when the cursor landed on the item to when the system actually voiced it.

These delays meant that sometimes voters thought the recording was finished and started to move on without hearing the full message. In one test instruction, voters are told to select a candidate endorsed by both parties. The gap between the two-party names was long enough that some did not hear the second party.

The voter who chose the fast speed discovered that the pauses do not seem to shorten at all, which makes the pauses feel even longer.

Why is this a problem?

Most voters only need the minimum number of instructions, with few repetitions, to successfully navigate the ballot. When instructions include too much detail, are too long, or repeat the same information over and over, it is difficult to retain all that has been said. Voters have either stopped listening or are fatigued from trying to remember it all. Some voters listen to all of the instructions just to be sure nothing has changed. Two blind voters that are very assistive technology savvy and usually move through the ballot quickly were slowed down significantly by the pace of the voice, the pauses, and waiting to hear new information each time.

Also, since most audio assistance users are accustomed to a fast voice, slow instructional and informational voices slow them down much like a sighted person would read slower if the text on a page were very faint.

Cognitive overhead. Whether it was trying to understand and remember all of the instructions or having to listen to different voices, significant effort was required to think through the process of voting. When voters have to

concentrate on what the voice is saying, they are not as able to determine who or what they would like to vote for.

Recommendations

To the extent that it is possible, counties should:

- Work with the vendor to make sure either all voices are the same or are limited to two different voices: one for instructions and one for ballot information.
- Rewrite the ballot instructions to be as concise as possible and include only as much information as necessary, since voters will be hearing it each time a contest is selected.
- When possible, use a modern text-to-speech (TTS) system in place of digitized voice. (Some languages do not have written versions, so the option for digitized voice must be retained.)

Typical speaking rate for people is in the range of 100 to 125 words per minute, but average reading speeds are in the range of 400 to 500 words per minute. The standard for synthesized voices for screen readers is that they remain understandable at speeds in excess of 600 words per minute, and many blind people can read in excess of 1000 words per minute, with appropriate voices. TTS systems designed for screen reading offer high speed reading, and the ability to spell words a letter at a time when spelling is not clear.

- Trim recorded files as tightly as possible so that there is no lead-in or trailing silence at the beginning and end of each recording.
- Preload all the text snippets progressively, so there is not such a long delay in the load time.

3. Touchscreen display issues

What happened?

Examiners and voters discovered three issues with the touchscreen and display.

- **Cursor difficult to see.** As voters using the tactile keypad or dual switch moved around the screen, the selected item had a blue box around it. When this highlight was over light areas of the screen, it was easy to see, and very effective. But when it was highlighting system controls, which had a black background, it faded into the background, and was very difficult to discern. Many times, voters lost the cursor and had to move the wheel or press a button to figure out where it was. For voters using the audio feedback with the MOVE wheel, this was not an issue, nor was it an issue for voters using the touch screen. But test voters using the Move wheel while reading the screen visually often lost track of the focus.
- **Large text size eliminates onscreen instructions.** Only one poll worker/voter used the large text. When they did they discovered the instructions panel on the left-hand side of the screen had disappeared. The number of choices remaining text moved to the top of the screen, which was helpful, but the “Vote for N” instruction is lost, leaving only the countdown for number of selections remaining. Audio voters do not lose the instructions, as they are voiced with each contest.
- **Fixed screen angle.** The touchscreen display is fixed in the voting machine and the angle cannot be changed to reduce glare.

Why is this a problem?

For voters using the wheel because of arm/hand limitations rather than vision, a lost cursor can be found easily by moving the wheel one direction and then returning it to the previous position. Dual switch users do not have this luxury. If they lose the cursor, and press the advance button to find it, it could easily move past the desired selection. This means they have to go through all of the options on the screen again to arrive back at the desired selection. For long contests or the write-in screen, this can take a long time and become very frustrating.

For this test, the instructions were the same on each screen, so when they disappeared while using the large text, it was not really an issue. However, the text in this box can be customized by the counties for each contest, and not all contests have the same instructions. The “Vote for N” information is very important so voters know how many choices they can make.

Polling location lighting varies greatly. For those with typical bright overhead lighting, glare may develop on the screen making it difficult for all voters, but especially those with sensitive eyes or low vision to see the screen.

Recommendations

Change the color and the width of the cursor highlight so it can be clearly seen, especially when against a dark background. Additionally, counties should alert poll workers that some voters may need help finding the cursor.

Minimally, put the "Vote for N" information in the same bar with number of choices remaining text. If possible, move the instructions bar to the top of the screen above or below the number of choices remaining box.

Additional observations can be found in the "All Observations" section of this report.

Special discussion

Paper ballot handling

One of the accessibility goals is to allow all voters to vote independently and privately, including verifying their ballot. All paper ballots introduce barriers for voters with low-vision, no-vision, and with limited dexterity.

Most voters appreciated the printed ballot, which allowed a second chance to review the vote before casting. The implementation of the printing and paper-handling of these paper ballots had some issues for voters and poll workers.

Reading the paper ballot

The Touch Writer and Duo ballot marking systems use two different printing options. The Touch Writer uses a separate, off-the-shelf printer that sits next to the voting machine. The on-demand, printed ballot looks identical to a pre-printed ballot used for absentee or provisional voters.

The Duo uses a thermal printer included inside the ballot marking device, so no separate printer is used. Voters are given a blank, specially formatted piece of cardstock when they check in. Only the voter's selections and associated scanning codes are printed in text on the paper.

Having the ballot marking device print on demand means that voters do not have to handle a blank, pre-printed ballot before making choices. While the Duo uses a blank, specially formatted piece of cardstock, it is still a blank piece of paper that does not resemble a conventional paper ballot in any way.

Using a traditional printed ballot is a problem for two reasons.

- **Touch Writer verification is not independently verifiable for some voters.** Blind and low vision voters often use personal assistive devices that read documents to them. Assistive technology (AT) examiners tried could not read the multi-column format back accurately, and it did not know which candidate or option the voter selected. All voters who tried to use this technology were unable to

verify their ballot.

Neither the Touch Writer nor the Duo provides a built-in feature to allow a voter to “read back” the ballot by reinserting the printed, completed ballot into the voting system. Therefore, the voter would require assistance from a sighted person to read back their choices to verify the printed ballot.

- **Duo Print too small and not formatted for easy verification.**

Sighted voters did not seem to have an opinion on the Duo’s voter selections- only printed ballot, but they all agreed that the text is too small and the contest lines are too close together for easy visual scanning.

AT had two problems reading the Duo ballot: the distance between the contest name and candidate meant that it often read this data as two separate lists. In addition, the ballot includes a sequence number and abbreviates the party name so the readback sounded jumbled.

Recommendations

- Always print ballots using “Voter Selection Only” (VSO). This allows personal AT to simply read the names on the print-out, rather than attempt to identify the filled ovals on the ballot. This format allows voters with personal assistive technology to read back their choices.
- Text on the printed ballot should meet VVSG requirements and be at least 3.0mm. Even with this small text, the layout can help voters read the ballot and verify their ballot more effectively.
 - Keep columns close together so that eyes tracking across the page do not have to travel far. If possible, connect spaces between columns with dots or dashes so voters can easily follow lines across the page.
 - Add space between rows of text.
- Include only what is absolutely necessary for the scanner to accurately read and cast the ballot. Codes and other technical

information are confusing and should be clearly separated from selection/no selection information.

- If a QR code is used for functions such as identifying the ballot type, this information should be placed next to it in readable text so that voters know what is on their ballot.

Interacting with the Verity Scan ballot scanner

The Verity Scan digital scanner had both positives and negatives. In general, the ballot scanner does not produce any major accessible voting barriers.

Some features stood out and could be considered a positive for voters with disabilities.

- The scanner tray opening is just wide enough for the ballot and has tall guides along the sides to minimize the chance that the ballot will be improperly inserted.
- Voters may insert the ballot in any orientation. This may lessen the interaction a poll worker will have to have with a voter with disabilities to cast their ballot.
- The scanner has a large touchscreen that indicates when a ballot has been accepted and cast successfully.
- There is a faint but audible chime to indicate a successfully cast ballot.

Examiners identified two negatives with the scanner.

- Since the Touch Writer ballot is printed on both sides, privacy is decreased while standing in line before scanning or being helped by a poll worker, even with the privacy sleeve.
- Blind, low vision, or low dexterity voters will not be able to scan their own ballot independently unless special AT is provided at the polling place.

Recommendations

- Make the cues more obvious that the ballot is cast. Use large print words or simple images on the screen to indicate the scanning steps and show that the ballot scanned successfully. Currently, the scanner shows a United States flag on the confirmation screen. A few voters questioned if that meant that the ballot was cast successfully. A clearer message would be helpful.

- There is a simple audio cue, but it was very quiet and should be louder. Many polling locations are loud and even in our test scenarios, simple conversation overpowered the chime, and voters missed it.
- Counties should purchase privacy sleeves to cover the ballot after the voter has reviewed it and until it is scanned. This will minimize invasions of privacy and will allow poll workers to assist more confidently.
- Counties should set aside a private area in each polling location and invest in devices that help voters using AT to read back their ballot to them.
- Train poll worker to assist voters in ways that do not compromise the voter's privacy. This might include having standard instructions for poll workers to use to guide a voter in casting their own ballot, or narrating the poll worker's actions so that the voter understands what the poll worker is doing.

MOVE wheel on the tactile device

Although the MOVE wheel requires some motor control, nearly all of our voters who were not using the touchscreen were able to use the wheel successfully. This included three voters who were quadriplegic, and had no finger control. These voters were able to use their knuckles to move the wheel while stabilizing the controller with their other hand.

That said, some participants had problems using it because of its size and how freely the wheel moves. These included:

- **Voting booth setup.** Because of the voting booth size, there was no place to stabilize the tactile interface. Voters had to either balance the device in their lap or hold it in their hands. Providing a deeper table with a lip would correct this, but move the touch screen farther away, providing additional issues. This problem was even more challenging on the Duo, because the ballot paper extended beyond the edge of the device. Placing the unit on a larger table with space in front of the machine is a potential solution to this issue.
- **Accidental movements.** The wheel can move freely in each direction, and it is relatively easy to move, which can be good and bad. Some voters with limited dexterity had to use the wheel with the edge of their palm or

their knuckles. As they dialed in their desired selection, and then took their hand off the wheel to press the select button, the wheel would often move again because they accidentally bumped it. They were able to move back to the wheel to correct such moves, but it slowed the voting process.

- **Easy to overshoot.** Because the wheel is easy to move and recordings do not begin to play immediately when the cursor lands on a selection, it can cause voters to overshoot their desired selection.

Voter session preferences and tutorial

When voters used the tactile keypad at the beginning of the session, the system recognized this and gave the voter three accessibility options.

- Audio only (with a blanked screen), with the MOVE wheel
- Audio and touchscreen, with the MOVE wheel
- Only touchscreen, with the MOVE wheel.

If the screen is active, the voter could use either the wheel or the screen. If the voter uses the audio and the screen, the audio does not voice the screen-touched selections. The audio only reads selections if they are highlighted by the wheel.

In many places the audio instructs the voter to turn the wheel clockwise for the next selection. We had one blind voter who did not know the meaning of “clockwise.”

After the accessible choice, the system asks the voter to set up the associated preferences for volume, playback speed, and text size and contrast, if using the screen. The system voices each option, but once a selection has been made, it does not voice a confirmation of that choice. Some voters did not know if their playback speed choice was set successfully, for example.

Once the voter’s preferences have been selected, the system guided them through a brief tutorial about how to use the MOVE wheel to make selections and deselections. Unfortunately, this section was very visually based—even though blind voters were using it too. It had call-outs pointing to different

options and elements of the screen, and to get the system to read aloud these sections, the voters had to highlight them with the MOVE wheel. Our blind voters stumbled through this section trying to understand what the system was trying to teach them because they did not have the benefit of seeing a top-down, visual layout.

Analysis

Examiner's reactions to the system's preferences and tutorial options are mixed because voter's reactions were mixed.

- One blind voter liked the tutorial and thought it would be beneficial to others.
- Other voters using the audio, screen, and wheel didn't have much of a reaction until the tutorial, where they seemed confused on what the system was asking them to do.
- For any of the assistive tech savvy voters, especially blind voters, they all wanted to skip it and move on.

It is important to point out that our blind voters had to go through both the audio and the screen setup options before getting to the tutorial because examiners needed to be able to see the screen. In a typical voting situation, this would not have been a requirement, and their reaction to the tutorial section may have been less harsh.

Examiners concluded that the idea of the voter's preferences and tutorial is good, and it could be very beneficial to first-time assistive technology users if redesigned slightly.

- Remove visually-based layout and design elements. Or at the very least, instruct the user to move the wheel to the right to hear the next element.
- Think carefully about instructions and commands. If using sight-related descriptive commands, such as "clockwise," also give a more concrete direction, such as "to the right." Some blind users may not have learned this term because they've never looked at a clock.

- Provide a way at the front to set up preferences, but allow experienced voters to skip the tutorial.
- If a voter has selected audio and touchscreen, voice all selections when touching the screen as well. This helps low-vision, low-literacy, and cognitively impaired voters understand the layout.

Recommendations for deployment

The participants – and examiners – saw the systems being tested for the first time during the examination. Many voters will also try using a new system for the first time in the voting booth, so our test was realistic for Pennsylvania voters.

The problems we encountered also suggest ideas for how election officials can support voters and poll workers as they introduce the new system and design their processes and procedures.

The recommendations here are based on observations of how both poll workers and voters used the system and direct suggestions they made.

Advanced training and hands-on practice

The need for an introduction and a chance to try out the system before Election Day was the strongest recommendation from every poll worker participant.

Poll workers felt strongly that any new system – particularly those with digital interfaces – would be intimidating to voters and fellow poll workers who were not used to computers. They recommended:

- Longer training sessions for poll workers to give them more time to familiarize themselves with a new system.
- Opportunities for hands-on experience, including scenarios for different situations they might have to handle.
- An aggressive voter education program to give voters a chance to try out the new system.
- Outreach to voters with disabilities, including those who regularly vote with assistance to let them know about the capabilities of a new system that might help them.
- Have voting machine hands-on demonstrations at disability events so that voters can get to know the machines, practice voting, and be prepared for what they may need on Election Day.
- Instructions or a practice system in the polling place, especially in districts with many older people.

Training for poll workers to support voters with disabilities

Poll workers may not be familiar with how to help people with disabilities. Most of the poll worker participants said that they had no blind or disabled voters in their polling places, although one pointed out that the features on these systems might enable their “assisted voters” to try voting independently.

In addition to a good training module on ways to help voters with disabilities, the training should focus on how to give instructions before and during a voting session to avoid compromising their privacy. For example:

- A “what if” troubleshooting guide could include specific questions to ask and prompts that poll workers can use to help a voter with problem solving without looking at the screen.
- Give poll workers guidance on where to stand while supporting voters. For example, standing behind the touchscreen and facing the voter would make it clear that they are not looking at the screen.
- Using the procedures for initiating a voting session, including the screens to select a language or acknowledge that assistive technology has been activated, to make sure that the voter has found the basic navigation keys on the keypad. On the Hart InterCivic systems, the setting and preferences buttons are at the top of the screen at all times. The poll worker can review these with the voter (reading the instructions to be sure they are consistent and accurate).

Poll worker procedures

Poll worker procedures can also help bridge any information gaps for voters, with instructions embedded in the voting process.

- Remind voters to check both the pre-printing review screen and their paper ballot before inserting it into the scanner.
- Tell voters that if they make a mistake, they can get a new ballot, if they have already printed it.

- Tell voters how to insert their ballot into the scanner: identify that the ballot must be placed in the center of the scan bed, and tell them the ballot is inserted directly into the machine, not just slid forward.
- Instruct voters that their ballot can be inserted into the scanner in any orientation. Using the privacy sleeve is the most secure. However, inserting the ballot upside down, with the print toward the floor, is sufficient.

Support for voters using the tactile keypad or dual switch and audio ballot might include:

- A keypad they can try out before entering the voting booth.
- Instructions for how to use the keypad in Braille, audio, and large print.
- Test all assistive aids with local voters.

As a voter approaches the voting station, poll workers can help voters adjust the voting system or attach personal assistive technology:

- Help voters get positioned at the voting system so they can reach all controls.
- Provide help plugging in personal headsets with verbal instructions or by doing it for the voter. The audio and dual switch jacks on this machine are located on the tactile keypad.
- Make sure voters are oriented and know where all parts of the voting system are, including the privacy shields or covers. This machine includes options to blank the screen during the audio ballot, but then there is a button on the screen to allow poll workers to bring back the visual mode if the voter has a question.
- Remind voters how to scan and cast their ballot and how to know when they are finished.

Polling place setup

Ensure all polling locations have at least one accessible voting booth with a chair that is easily removed if a voter uses a mobility device.

Voters with disabilities may have assistive technology or personal notes that they need to place within reach. They may also need room to place the

printed ballot on a flat surface when using simple personal technology, such as magnifiers or text readers to verify it.

For all voting machines, the path to the touch screen and the scanner should be as easy as possible, ideally a straight line with no obstructions. The path should include ample room to turn a wheelchair if the machine is positioned with the screen facing the wall. The ADA standards suggest a minimum of 60x60 inches for this.

Use assistive technology to support blind and low-vision voters in verifying their ballot, for example, a magnification unit or a simple OCR scanner.

Voting booth setup for this system

Two issues were identified specifically for this system during the examination and usability testing related to how the system and attached devices are placed. The system fits very tightly in the accessible voting booth supplied by the vendor for the exam.

- **Cable management for assistive devices.** The tactile keypad is normally stored in front of the screen, connected on a semi-permanent cord. The headphone is plugged in on the tactile keypad. The printer could be set up to the right or left.
Recommendation: The cords need to be placed so that they don't interfere with the printed ballot or the voter's ability to find and take their printed ballot.
- **Privacy.** The footprint for this system is small, and the screen is already at the back of the system. For some wheelchair or scooter users, this may be too far back from the edge of the table.
Recommendation: Position the booth so the voter's back is to a wall, so no one can walk behind them, and with sufficient space to the left and right. However, be sure that there is a good path for a manual or motorized wheelchair to get to the voting booth easily (see above), and be sure the system screen isn't too far back that it is within comfortable reaching distance for those in a wheelchair or scooter.

Attachment C – Implementation Attestation



Hart Verity Voting
2.6 implementation



Voting System Implementation Attestation

System Name: _____

County: _____

Date Installed/Upgraded: _____

The below hardware/software was installed and verified on the system implemented:

System Component	Software or Firmware Version	Hardware Version	Model	Comments
Verity Data				(Please specify the implementation, single device (desktop/laptop), Client/server)
Verity Build				(Please specify the implementation, single device (desktop/laptop), Client/server)
Verity Central				(Please specify the implementation, single device (desktop/laptop), Client/server)
Verity Count				(Please specify the implementation, single device (desktop/laptop), Client/server)
Verity Print				
Verity Scan				
Verity Touch Writer Duo				

Verity Controller				

Note: The table above represents an outline of the expected details in the implementation attestation. Add additional components/software installed.

Further to the key hardware/software components listed above, any of the COTS software installed on the voting system adheres to the EAC certificate of conformance for the Verity Voting 2.6 system. Any ancillary components like switches, ballot boxes, charging carts sold on this contract are EAC certified components of the Verity Voting 2.6 electronic voting system. (Attach a list of items sold on this contract.)

Hart also has validated that the systems have been installed and hardened following the EAC certified system hardening instructions and no software other than the voting system software has been installed on any of the components.

Vendor Representative Signature: _____

Vendor Representative Name: _____ **Title:** _____

Telephone: _____ **Email:** _____

County Representative Signature: _____

County Representative Name: _____ **Title:** _____

Attachment D – Minimum Training Requirements

Hart must provide training and training materials as set forth below prior to the first use of the voting system in a primary or general election.

- a) A demonstration of and training on the setup and operation of the Voting System to the purchasing county's board of elections' members and staff, and the county's precinct election officials.

- b) A training session on the Voting System's election management system and/or EPBs for the purchasing county's board of elections' members and no less than two and no more than six staff members chosen by the board of elections. The training sessions must afford the board members and its staff the opportunity to learn how to setup and program an election, and if applicable design and layout ballots independently of the Supplier's assistance and support.

- c) A training session on the following subjects for the purchasing county's board of elections' members and no less than two and no more than six staff members chosen by the board of elections:
 - i. programming of all voting units and ancillary devices;
 - ii. tabulating results during the unofficial and official canvass;
 - iii. ensuring accuracy and integrity of results;
 - iv. preparing polling places and setting up the system for election day operation;
 - v. training on accessibility options of the voting system;
 - vi. Election Day operating procedures;
 - vii. auditing procedures;
 - viii. conducting a recount;
 - ix. preserving records;
 - x. printing, designing, and formatting election reports;
 - xi. troubleshooting common issues;
 - xii. safeguarding and preventing tampering and unauthorized access to all parts of the Voting System; and

xiii. Post-election care, maintenance, and storage.

d) Any and all system manuals necessary to allow a purchasing county to operate the Voting System independently of the Supplier's assistance and support.

e) Training materials for a purchasing county board of elections to use when training its precinct election officials on how to setup, operate, and close down the Voting System on Election Day.

Attachment E – Source Code Escrow Obligations for Hart

The supplier must maintain an escrow agreement covering all source codes of the Voting System and/or EPB for a period of 10 years from the date of delivery to and acceptance by a purchasing county board of elections. The Pennsylvania Secretary of the Commonwealth shall have the right to access the source codes in escrow subject to the conditions specified below in Item d). The supplier must pay all costs associated with 1) placing the codes in escrow and 2) verifying that the supplier has placed the codes in escrow (note: the escrow agent conducts this verification and charges a separate fee for this service).

- a. Source code. Simultaneously with delivery of the Voting System and/or EPB software to purchasing counties, the supplier shall deliver a true, accurate and complete copy of all source codes relating to the software to an escrow agent.
- b. Escrow. To the extent that Voting System and/or EPB software and/or any perpetually-licensed software include application software or other materials generally licensed by the Supplier, supplier agrees to place in escrow with an escrow agent copies of the most current version of the source code for the applicable software that is included as a part of the services, including all updates, improvements, and enhancements thereof from time to time developed by supplier.
- c. Escrow agreement. An escrow agreement must be executed by the parties, with terms acceptable to the Commonwealth prior to deposit of any source code into escrow.
- d. Obtaining source code. Supplier agrees that upon the occurrence of any event or circumstance which demonstrates with reasonable certainty the inability or unwillingness of supplier to fulfill its obligations to Commonwealth counties. Commonwealth shall be able to obtain the source code of the then-current source codes related to Voting Systems software, EPB software, and/or any Supplier Property placed in escrow from the escrow agent.