

SLI Compliance, a Division of Gaming Laboratories International, LLC (SLI)

Voting Systems Certification Program

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4720 Independence St.
Wheat Ridge, CO 80033
303-422-1566

www.SLICompliance.com

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Document History

Rev.	Date	Change
1.2	August 26, 2021	Minor QA edits, updated job titles
1.3	September 21, 2021	--1.2: Clarified that surveillance also occurs in response to complaints and nonconformities --Updated section 13 to specify annual review for use of the mark
1.4	November 1, 2021	--12.1: Added arbitration procedure
1.5	March 30, 2023	--1: Added VVSG 2.0 --Corrected an incorrect hyperlink.



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1 Scope

This document serves as the product certification scheme for SLI Compliance (SLI).

Key Terms and Definitions:

Customer: The organization that submits an application for a product to be evaluated and certified in accordance with this certification scheme. Examples of customers include suppliers and manufacturers of voting system products.

Certification Scheme: A certification system related to specified products, to which the same specified requirements, specific rules and procedures apply (the rules, procedures and management for implementing product certification are stipulated by the certification scheme). ISO/IEC 17065:2012 clause 3.9.

Scheme Type 1a: One or more samples of the product are subjected to determination activities. A certificate is issued for the product type. The samples are representative of subsequent production items which could be referred to by the manufacturer as being manufactured in accordance with the certified type. ISO/IEC 17067:2013 clause 5.3.2.

Surveillance: Systematic and on-going verification of product conformity to the requirements stated in the certificate. It should be noted that surveillance is not required for Type 1a certification schemes.

This certification scheme is classified as a type approval scheme based on type testing. SLI evaluates and certifies voting system products against jurisdictional requirements/standards/specifications (hereinafter referred to as jurisdictional requirements) as requested by the submitting customer. Evaluation of voting system products is accomplished in accordance with ISO/IEC 17025:2017, to which SLI adheres in its entirety, with one exception—SLI is not a calibration laboratory, and therefore requirements exclusive to calibration laboratories accredited under ISO/IEC 17025:2017 are not included in this scheme. Certification of voting system products is accomplished in accordance with ISO/IEC 17065:2012.

Voting system products subject to evaluation and certification include, but are not limited to election management systems (EMS) used to define ballots, report or display election results and produce and maintain audit trail information; ballot marking devices (BMD); ballot boxes; direct recording electronic (DRE) devices; hybrid voting devices including but not limited to DRE/BMD combination devices; and optical scanners (precinct count and central count scanner types).



The requirements against which submissions are evaluated are those stated in the Voluntary Voting System Guidelines (VVSG) versions 1.0, 1.1 and 2.0, and other specific requirements/standards/specifications (for example, regulatory requirements specified by a governmental agency) used in conjunction with the SLI Voting Systems Certification Program and as indicated on the applicable Scopes of Accreditation. Certifications that are under the authority of the U.S. Election Assistance Commission (EAC) are excluded from SLI certification.

The requirements in this manual apply to SLI (the certification body) and the customer submitting a product(s) for certification. This manual is approved, issued and controlled by SLI management.

1.1 Authority

SLI Executive Management authorizes the use of this document for product certification activities.

INDEPENDENCE AND OBJECTIVITY:

Objective: To maintain a high degree of impartiality in all activities associated with certification procedures.

SLI certification activities shall remain free from interference by any element in a customer's organization or SLI, including matters of audit, scope, procedures, frequency, timing, or report content.

SLI shall not discriminate in the certification processes.

SLI shall have no operational responsibility or authority over any submissions for evaluation or certification. SLI shall not engage in any activity that may impair impartiality, independence or objectivity when implementing controls, developing procedures, installing systems, preparing records, or conducting any other activity. SLI, its employees, officers, and directors shall not engage in any business which manufactures, designs, distributes, or sells voting systems products (as described in Section 1 above).

1.2 Surveillance

This is a Type 1a product certification scheme (in accordance with ISO/IEC 17067:2013). SLI does not engage in surveillance activities except to verify proper use of the "SLI Certified" mark and in response to complaints relevant to the certification requirements or other information indicating a potential nonconformity.



SLI conducts regular desktop or website audits of customers that have been granted certification for a voting system product to verify that use of the “SLI Certified” mark is compliant with the usage guidelines and term and conditions. SLI will communicate directly with the customer results of all audit activity that will require the customer to address specified changes, updates or other items as identified during the audit process.

The types of surveillance activities conducted by SLI will include:

- Correct usage of the SLI Certified mark.
- Statements about SLI and the certification achieved must not be misleading or contain inaccuracies.
- The name and version number of the product described as certified by the customer must match the certified product name and version on file at SLI.
- Reactive surveillance in the case of a relevant complaint or potential nonconformity.

2 Applicable Standards and Normative References

- ISO/IEC 17000:2004, Conformity Assessment – Vocabulary and general principles
- ISO/IEC 17025:2017, Conformity Assessment – General requirements for the competence of testing and calibration laboratories
- ISO/IEC 17065:2012, Conformity Assessment – Requirements for bodies certifying products, process
- ISO/IEC 17067:2013, Conformity assessment – Fundamentals of product certification and guidelines for product certification schemes

The version of each standard or normative reference listed above is current as of the effective date of this scheme.

3 Application Requirements

3.1 Application

The application process is initiated by contacting SLI (refer to contact information at the end of this document) or visiting www.slicompliance.com. An account manager will be assigned who will provide guidance throughout the entire application process including determining product, schedule, scope of services, pricing and other requirements.

Information on SLI’s testing services may be found at <https://slicompliance.com/services/voting-system-certification-testing/>.

Following the initial contact, the Account Manager initiates the application by providing to the customer the pertinent documents to complete the application. The application



documents include the Application Form and the Services Agreement (SA), which includes pricing, the certification agreement and the Terms and Conditions.

SLI will only accept certification projects for voting systems products within SLI's ISO/IEC scope of accreditation. The application process and the SA will identify requests that are outside the scope.

3.2 Application Review

On receipt of all submissions for evaluation or certification, SLI will complete an initial review ensuring at minimum the following information is covered:

- a) Information about the customer and the product is sufficient for SLI to conduct certification activities;
- b) Any differences between SLI and the customer are resolved, including agreement regarding standards and terms and conditions;
- c) A service agreement including the certification agreement is defined;
- d) The means are available to perform all evaluation activities;
- e) SLI has the competence and capability to perform the certification activities.

If the type of product or normative document is unknown or is not familiar to SLI, SLI reserves the right to perform all necessary technical reviews and activities deemed appropriate prior to the acceptance of an agreement for testing or certification.

Prior to engaging in any activities as described above, SLI will ensure it has the competence and capability for the activities requested by the customer. SLI will maintain records of the justification for the decision to undertake evaluation or certification activity.

SLI will not accept submissions or undertake specific activities of testing or certification if SLI deems it lacks the competence or capability to undertake the submission.

SLI will, at their discretion, use certifications or reports already granted to the client to omit any activities deemed unnecessary. SLI will reference the existing certification in its records. In each circumstance, SLI will provide justification for omission of any activities.

4 Certification Process

4.1 Certification Agreement

The service agreement is a legally enforceable agreement between SLI and the customer and includes the certification agreement, which stipulates the responsibilities of SLI and the customer. The requirements under the certification agreement are as follows:



- Customer shall adhere to the requirements of the Voting Systems Certification Program manual.
- Customer shall implement appropriate changes when they are communicated to Customer by SLI;
- If the certification applies to ongoing production, Customer shall ensure that the certified product continues to fulfill the product requirements;
- Customer shall make all necessary arrangements for conduct of the evaluation, surveillance (if required), examination of documents and records and access to relevant equipment, locations, areas; personnel and customer subcontractors; investigation of complaints and the participation of observers if applicable;
- All claims regarding certification must be consistent with the scope of certification;
- Product certification shall not be used in such a manner as to bring SLI, the certification body, into disrepute and Customer shall make no claims or statements regarding a product certification that SLI may consider misleading or unauthorized;
- Upon suspension, withdrawal or termination of certification, Customer will immediately discontinue use of all advertising matter that contains any reference thereto and takes action as required by this certification scheme or any other required measures as stipulated by SLI;
- All copies of certification documents shall be reproduced in their entirety or as specified by SLI;
- In all communication media that make reference to its product certification, Customer shall comply with any requirements that may be prescribed by SLI or as specified by the certification scheme;
- Customer shall comply with all requirements relating to the use of marks of conformity as specified in the SLI Certified Mark Terms of Use and in this Certification Program manual;
- Customer shall keep records of all complaints made known to it regarding compliance with certification requirements and shall make these records available to SLI upon request, and
 - Take appropriate action with respect to such complaints and deficiencies found in any products that affect compliance with the requirements for certification;
 - Document the actions taken;



- Customer shall inform SLI, without delay, of changes that may affect its ability to conform to the certification requirements;
- Customer shall inform SLI regarding changes to the certified product immediately upon implementation.

4.2 Conditions for the Use of the Certification Report

SLI issues a certificate that documents the requirements under which the product is certified. Use of the certificate by the customer is subject to the following conditions:

- a) SLI is the sole owner of this certification scheme and is the only certification body authorized to certify products under this scheme or to refer to this scheme in marketing or publicity materials.
- b) Customers of SLI may refer to certification, and by extension this scheme, only to the extent authorized under the certification agreement described above.
- c) SLI maintains control over the ownership, use and display of certificates and any other mechanisms for indicating a product is certified.
- d) All incorrect, including fraudulent, references to certification or misleading use of certificates or any other mechanism for indicating a product is certified, for example in marketing or publicity materials, shall be subject to review by SLI and may result in the suspension, withdrawal or termination of certification or other suitable action as deemed appropriate by SLI.

4.3 Management of Impartiality

SLI has implemented a mechanism to safeguard impartiality. This mechanism is a process that evaluates risks to impartiality on an on-going basis with the purpose of eliminating or minimizing risks to impartiality and conflicts of interest and ensuring that commercial, financial or other pressures do not compromise impartiality. The following elements are taken into account by the mechanism to safeguard impartiality: staff awareness, training and education; management oversight; and mitigation and corrective action.

SLI top management has designated the Quality Management Team as responsible for reviewing risks to impartiality and reporting to top management. In addition, input on SLI impartiality is obtained from external stakeholders from the voting industry. A Stakeholder Committee on Impartiality meets annually, and its membership is configured to ensure balanced representation.

When a risk to impartiality is identified, it is evaluated for impact to SLI and appropriate corrective actions are taken in accordance with SLI's corrective and preventive action



procedures. The Quality Management Team reports all identified risks to impartiality to top management through the management review. If a severe risk is identified that has an immediate impact on and may compromise the impartiality of SLI, the Vice President shall be informed immediately.

SLI and any part of SLI shall not be the designer, manufacturer, installer, distributor or maintainer of any product certified under this scheme.

4.4 Non-discriminatory Conditions

SLI's policies and procedures are non-discriminatory and do not impede access to certification services. SLI allows access to any applicant that requests certification within the scope of SLI's operations. SLI places no undue financial conditions or conditions related to the size of the applicant, membership in a group or association, or prior certifications issued by SLI. SLI reserves the right to decline an application for certification, or cancel an executed contract for certification, for reasons such as client participation in illegal activities, a history of repeated nonconformity to requirements, or other issues such as a history of non-payment for services rendered.

4.5 Confidentiality

SLI treats all information obtained or created during the performance of certification activities in strict confidentiality, except for information that the client makes publicly available or when agreed between SLI and the client. All other information is considered proprietary information and shall be regarded as confidential. SLI informs the client, in advance, of the information it intends to place in the public domain. When SLI is required by law, court order or legally authorized contract to release confidential information, SLI will inform the customer of the request and information that will be provided, unless otherwise prohibited by law or order from informing the customer. Information about the customer obtained from sources other than the customer (such as from a complainant or a regulator) shall be regarded as confidential by SLI.

4.6 Publicly Available Information

This certification scheme is publicly available through www.slicompliance.com and provides information about the certification process for SLI including evaluation, and the rules and procedures for granting, maintaining, extending, reducing, suspending, withdrawing or refusing certification. This certification scheme also describes the rights and duties of applicants and clients including requirements, restrictions or limitations on the use of the SLI name.

SLI is a legal entity and charges fees for its services.



5 Evaluation

- a) Following the initial review of the application or submission, SLI assigns the submission document to an appropriate Technical Manager for determination of the specific testing activities required to ensure the submission is completed. The Technical Manager has the discretion to assign the work activities to qualified personnel. The progress of all work activities is recorded and monitored for accuracy and completeness.
- b) SLI assigns competent and qualified personnel to perform specific work activities as described in the submission documentation. In the event that SLI outsources any tasks, SLI ensures the personnel performing the tasks are competent and qualified to perform the task assigned to them. SLI will inform the customer of any outsourced tasks including the location of where each task was completed.
- c) SLI ensures that all personnel performing evaluation tasks, either internal or outsourced, have access to the SLI Intranet, which contains all of the approved and controlled documents, checklists, work instructions and other materials that are relevant to perform the specific evaluation tasks for each submission.
- d) All evaluation tasks are performed internally by qualified and competent SLI personnel unless otherwise specified and communicated to the customer of the necessity to outsource specified tasks. All evaluation activities, internal and/or outsourced, are performed according to the specific instructions of the customer and within scope of SLI's accreditation to ISO 17025:2017.
- e) SLI generally will only rely on results of evaluation or certification activities completed prior to receipt of the current submission documentation if SLI can confirm that the tasks performed have been completed to the satisfaction of SLI evaluation requirements, including competence, accreditation, and conformance to the requirements of relevant international standards.
- f) SLI will inform the customer of all nonconformities identified during evaluation.
- g) If one or more nonconformities have arisen, at the discretion of the customer, SLI will either terminate further evaluation activities or will continue the evaluation process and provide information regarding the additional evaluation tasks needed to verify that all nonconformities have been corrected.
- h) If the customer agrees to the continuation of the additional evaluation tasks, SLI will again assess the additional evaluation tasks prior to continuing to complete the activities specified in the originating submission.



- i) SLI electronically retains all working papers, checklists and other documentation for each submission for traceability and verification and SLI will provide the customer with a final written report pertaining to the work as specified within the submission documentation.

6 Certification Review

SLI's voting system certification body (VSCB) manager is responsible for implementing certification procedures by evaluating the testing results and supporting documentation and ensuring that all certification requirements have been met. The VSCB manager assigns at least one person to conduct the review. The review and subsequent recommendation regarding the certification decision are documented.

If deficiencies are identified, the customer and the Testing Lab, as appropriate, will have the opportunity to provide clarification or additional information. At the conclusion of the certification process, SLI will issue the certification and the certification information is published to the SLI registry of certified voting system products.

7 Certification Decision

SLI is responsible for and retains authority for all decisions related to certification and does not outsource the certification decision.

The final determination for certification is confirmed by the VSCB Manager or Deputy. The VCSB Manager may also conduct the certification review (Section 6).

All staff members involved with the certification review and decision are regular employees or under contract with SLI to ensure impartiality and mitigate any instance of conflict of interest.

If an adverse certification decision is reached by SLI, the customer is notified of the reasons for the adverse certification decision. The certification process may continue, at the discretion of the customer, but shall resume at the evaluation step (Section 5).

The customer may appeal SLI's certification decision (see Appeals and Complaints).

8 Certification Documentation

SLI issues a certification report that unambiguously identifies the product and the jurisdictional requirements under which the product is certified.



The certificate includes SLI contact information, the date(s) certification is granted, the submitter's contact information, the scope of the certification, the expiry date(s) of certification (if applicable), and any other information as appropriate. The certificate is signed by the VSCB Manager.

A certificate will only be issued if the voting system product submitted for certification passes the requirements against which the product(s) was evaluated. No interpretation of the certification decision is required; the voting system product(s) either passes, and a certification report is issued, or fails, and certification is denied.

9 Directory of Certified Products

9.1 General

SLI retains all certification documentation indefinitely in an electronic format including:

- a) Identification of the product;
- b) The requirements to which conformity has been certified;
- c) Identification of the customer.

9.2 Registry

SLI maintains a registry of certified voting system products. The registry includes the name of the customer, identification of the certified product, scope of the certification, unique certification identifier, date of issuance, expiration date (if applicable), and any explanatory notes. SLI will provide information about the validity of a certification upon request. The VSCB Manager is responsible for the publication of the registry.

10 Changes Affecting Certification

If SLI introduces new or revised requirements that affect the client, SLI shall ensure these changes are communicated to the client. SLI shall further verify the implementation of the changes by its clients. SLI will also consider changes initiated by the customer.

SLI will consider the actions required to implement changes such as the evaluation, review, and decision, as well as the issuance of revised certification reports to extend or reduce the certification.



11 Termination, Reduction, Suspension, or Withdrawal of Certification

SLI decides on the appropriate action that is to be taken when a nonconformity with certification requirements (i.e., a certified product no longer complies with the applicable jurisdictional requirements) is substantiated. The appropriate action taken can include:

- Continuation of certification under conditions specified by SLI;
- Reduction in the scope of certification to remove the non-conforming product variants;
- Suspension of certification pending remedial action by the customer;
- Withdrawal of certification;
- Conduct of a new evaluation, certification review or certification decision.

The VSCB Manager (or delegate) will inform the customer of the reasons for a suspension and of actions needed to end suspension and restore certification. If a certified product is under suspension for more than thirty (30) calendar days, the conditions of the suspension will be reviewed and SLI will determine if continued suspension is warranted, or if the certification should be terminated.

12 Appeals and Complaints

12.1 Appeals

When SLI determines a product does not meet the criteria required to issue a certification, the customer can contest the findings by making a written appeal to the SLI Compliance Vice President. All appeals/disputes must be submitted in writing (mail, fax, email). When submitting an appeal/dispute to SLI for review, the following information should be included:

- a) The reason(s) that the denial or revocation of certification should be reversed, including objections, corrections, and factual information that may be relevant to the appeal/dispute;
- b) The specific elements of the certification program to be addressed in the appeal/dispute;
- c) The preference of the customer regarding whether to be present during the review meeting with SLI personnel;
- d) The contact information of any person the customer plans to include in the meeting in order to present factual information, and a clear description of the factual information available from this person(s); and



- e) A list and copies of all relevant documents, exhibits, or other information the customer intends to submit in support of the appeal/dispute.

SLI acknowledges receipt of each appeal/dispute. Following a thorough assessment of the appeal and any related facts, SLI's Management Team will make a determination of compliance or conformity, in accordance with internal appeals processing procedures. SLI will inform the customer of any further action required to remedy the situation. Once the decision has been confirmed by SLI, no further appeals are accepted unless new evidence is presented or discovered that may result in a reversal of the appeal.

The appealing party may request a third party arbitration if they disagree with the decision. The third party arbitration will be conducted by the American Arbitration Association, <https://www.adr.org/>. The appealing party will be responsible for all costs related to the third party appeal regardless of the decision by the arbitrator.

12.2 Complaints about SLI's Services

Any expression of dissatisfaction with SLI products or services requiring a response is managed as a complaint. Upon receipt of a complaint, SLI immediately initiates an internal complaint management process to investigate, analyze and assess the complaint. All complaints are acknowledged with the complainant within 30 days of receipt of the complaint.

12.3 Complaints about Customer Product Compliance

As stated in the Certification Agreement, the customer shall keep records of all complaints made known to it regarding compliance with certification requirements and shall make these records available to SLI upon request. The customer shall take appropriate action with respect to such complaints and deficiencies found in any products that affect compliance with the requirements for certification.

Users or purchasers of voting system products certified by SLI that have complaints or questions about the certified product functionality may submit such complaints by contacting SLI at info@slicompliance.com. All complaints will be reviewed for validity and relevance to a certified voting system product. The product certification may be suspended or withdrawn if the complaint is valid and compromises the integrity of the product certification. The customer and any associated affected entity (e.g., a regulatory body, accredited test lab, etc.) will be notified.



13 SLI Certified Mark Usage Guidelines

The customer may begin using the SLI Certified mark upon notification by SLI that certification has been issued. Use of the mark is optional; however, it must be used in accordance with the usage guidelines and terms and conditions, which are provided to the customer in electronic format after certification is granted.

The voting system product certification applies to the specific product that was certified, and not to the customer's company as a whole; therefore, use of the mark must be clearly attributed to the product that received certification. Use of the mark must include your product name and the jurisdictional requirement against which the product was certified, and as described in the certification report.

SLI requires an annual renewal of the use of the mark, done within one month before or after the anniversary of the certification. During this time window, SLI will confirm that the user of the mark continues to conform to the applicable standard(s) – i.e., the product has not changed, or SLI has approved that any changes don't affect the certification, and the product is still supported by the manufacturer.

14 Press Releases

All marketing materials related to certified products must adhere to the guidelines posted in the "SLI Compliance Certified Mark Usage Guidelines" section above. Any press release that includes information about SLI must undergo a review and approval process by SLI. *The review may take 5 business days or longer.* The Account Manager can provide assistance and additional information.

15 SLI Compliance Contact Information

For more information about SLI's Voting Systems Certification Program, contact us at info@slicompliance.com.

SLI Compliance
4720 Independence St., Wheat Ridge, CO 80033
Phone: (844) 754-8683

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