



U.S. ELECTION ASSISTANCE COMMISSION

633 3rd St. NW, Suite 200

Washington, DC 20001

EAC Decision on Request for Interpretation

2024-02 12.1-B Unauthorized physical access alert

Sections of Standards or Guidelines:

12.1-B – Unauthorized physical access alert

Voter-facing scanners and electronic BMDs must produce an alert if access to a restricted voting device component is detected during the activated voting stage.

Discussion

This alert is meant to call attention to election workers in the polling place.

Date:

June 21, 2024

Question(s):

Is it required for voter-facing equipment such as precinct scanners and electronic BMDs to produce an audible alarm if access to a secure container that stores or transports voting system records is detected during an activated voting state?

Discussion:

Section 12.1 of Voting System Guidelines 2.0 (VMSG 2.0) is intended to support mechanisms to detect unauthorized access within a voting system. Requirement 12.1-B states that voter-facing scanners and electronic ballot marking devices (BMDs) must produce an alert when unauthorized access to a restricted component is detected during the activated voting stage. Restricted components of a voter-facing scanner or BMD are not explicitly defined in VMSG 2.0, therefore, analysis is necessary to determine what aspects of these devices are applicable under 12.1-B.

The question posed refers to “a secure container that stores or transports voting system records” in the context of precinct scanners and BMDs. Requirements 12.1-A and 12.1-E are applicable to secure containers, specifically in the context of an unauthorized access event. Requirement 12.1-A generally states that voting system devices must leave physical evidence that an unauthorized event has taken place. Requirement 12.1-E is a subset of 12.1-A which states more specifically that unauthorized physical access to a container that stores or transports voting system records must result in physical evidence that an unauthorized event has taken place. Ballot boxes are mentioned in the discussion for 12.1-E as an example of such a secure container. These two requirements encompass the expectations around secure containers. Based on this, the EAC interprets requirement 12.1-B as being not applicable to secure containers.



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The intent of requirement 12.1-B is to produce an alert that sufficiently calls an election worker's attention when the voter-facing scanners and electronic BMDs detect unauthorized access connected to the system's settings, configuration, and location of memory. This requirement also applies to any unauthorized access to the physical voting system's ports or areas containing removable media.

Conclusion:

Voter-facing scanners and electronic BMDs that utilize a secure container to store or transport voting system records are not required to produce an alert if unauthorized access to such a secure container occurs during an activated voting state.

Effective Date:

As of the date this document is published.