



Pro V&V, Inc.
6705 Odyssey Drive, Suite C
Huntsville, AL 35806

May 10, 2024

Attn: Jonathon Panek
Director, Testing and Certification
U.S. Election Assistance Commission

Re: Not Applicable Component in Clear Ballot Group (CBG) Test Documentation

Dear Mr. Panek-

This purpose of this letter is to provide the results of the internal investigation conducted by Pro V&V, Inc. regarding the issue discovered in the Clear Ballot Group (CBG) test documentation generated for the ClearVote 2.2 and 2.3 systems. Specifically, the issue that centers on the ELO POS Model documentation contained within the CBG-submitted technical documentation and subsequently included in the Pro V&V-generated test plan and test report.

Background

The technical documentation submitted as part of the ClearVote 2.2 modification test campaign contained the following documents relating to the model EPS15E3 for the ELO POS:

- ClearVote Approved Parts List Ver 1.2.5 - 06/25/2021
- ClearAccess Installation Guide Ver 1.8.4 - 10/06/2021
- ELO TOUCH - EPS15E3 specifications.pdf

The technical documentation submitted as part of the ClearVote 2.3 modification test campaign contained the following documents relating to the model EPS15E3 for the ELO POS:

- ClearVote Approved Parts List Ver 2.0.4 - 07/14/2022
- ELO TOUCH - EPS15E3 specifications.pdf

Issue

The test plan generated by Pro V&V for ClearVote 2.2 was based on the submitted documentation and included references to ELO POS model EPS15E3. CBG sent an ELO POS model E2 to Pro V&V for testing. As the test campaign was a modification campaign, Pro V&V inspected any new components that had been submitted, including the E2 model ELO POS. The serial number included in the report corresponds to an E2 model, as taken from the unit. The model number recorded for the test plan was taken from the Approved Parts List (APL). The baseline system components (ClearVote 2.0) were also included in the PCA as a carryover and were verified by serial number. Additionally, as all information was submitted in the technical documentation, the TDP review would not have exposed the issue as the

component was expected to be submitted. Once testing was complete, the final report was generated based on the approved test plan. Therefore, the model EPS15E3 was incorrectly included. During the review of the final report, it was not discovered that the component list contained an incorrect model, as the information was verified against the manufacturer technical documentation.

The test plan generated by Pro V&V for ClearVote 2.3 was based on the submitted documentation and the published ClearVote 2.2 test report. Since the baseline test report and the ClearVote 2.3 APL contained the E3 model, the test plan included references to the model EPS15E3. As the test campaign was a modification campaign, Pro V&V based the PCA on the former campaign and inspected any new components that had been submitted and recorded the serial number of the units. The model number was taken from the APL. Once testing was complete, the final report was generated based on the approved test plan. Therefore, the model EPS15E3 was incorrectly included.

Conclusion

Pro V&V concluded that performing a second PCA against the configured ClearVote 2.2 system prior to generating the test report would have exposed the oversight. Pro V&V implemented a process to perform two PCAs and capture this information on the Smartsheet project folder along with the submitted technical documentation that contains the system component list. The first PCA will be performed during the test plan phase and the second PCA will be performed prior to release of the test report. The information contained in each PCA will be checked against the component lists contained in the technical documentation for verification that the component lists are correct.

Pro V&V has opened Corrective Action Request (CAR) No. 2024-VSTL-01 to track this issue through to resolution. Pro V&V identified all ClearVote 2.2 and ClearVote 2.3 test documentation impacted by this error and has completed the necessary updates for resubmission.

Should you have any questions or wish to discuss the matter further, please contact me.

Sincerely,



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