



U.S. ELECTION ASSISTANCE COMMISSION

633 3rd St. NW, Suite 200
Washington, DC 20001

EAC Decision on Request for Interpretation

2024-03 12.1-D Logging of physical connections and disconnections

Sections of Standards or Guidelines:

12.1-D – Logging of physical connections and disconnections

The voting system must log when a voter-facing scanner, electronic BMD, or other component is connected or disconnected during the activated voting stage.

Discussion

Logging of the devices is vital for determining cause and providing incident information if a physical security event occurs.

Date:

June 21, 2024

Question(s):

Is it required for voter-facing equipment such as precinct scanners and electronic BMDs to monitor and log the event of accessing a secure container, such as opening and closing the door to a ballot box, during an activated voting state?

Discussion:

Per the discussion for requirement 12.1-D, the logging of events concerning the voting system component is vital for determining cause and providing incident information if a physical security event occurs. These logs help to enable the reconstruction of events related to an election. Requirement 12.1-D pertains to the security events in which a system component is connected or disconnected during an activated voting stage and applies to voter-facing scanners, electronic ballot marking devices, or other components of the voting system.

Within a voting system, a secure container that stores or transports voting system records, such as removable media devices, are considered a restricted area of a voting device component. Requirement 12.1-D applies to the connection or disconnection of a voting system component during an activated voting stage. The opening and closing of the ballot box doors do not constitute a connection or disconnection. Therefore, accessing the ballot box by opening or closing a door to the ballot box, does not require an entry in the logs. However, if access to the ballot box requires the disconnection of the voter facing scanner or the BMD, that event must be logged if it occurs during an active voting state.



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Another requirement of note is 12.1-E, which states “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.” This requirement applies to secure containers used to store and transport voting system records, including ballot boxes. While the opening or closing of a ballot box does not require the voting system to produce an entry in the voting system logs, it will require physical evidence that an unauthorized event has taken place.

Conclusion:

To meet requirement 12.1-D, precinct voting system components are required to generate an entry in the appropriate logs when a component is connected or disconnected during the active voting stage. Access to a secure container such as opening and closing of a door are not considered a connection or disconnection, so an entry is not required within the logs. However, if access to the ballot box requires the disconnection of the precinct voting system device during an active voting stage, then the event must be logged.

Effective Date:

As of the date this document is published.