Qualification Test Report
Democracy Live
OmniBallot™, Version 1.1

July 2020*

Florida Department of State
Division of Elections
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*The OmniBallot system was approved on July 14, 2020. A typographical error was discovered and is documented here as Footnote 2 on this updated report, uploaded on July 16, 2020.
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Executive Summary

Democracy Live’s OmniBallot™ system is a web application available to county elections staff and voters with the use of any web-enabled computer. The system consists of two major components – an administrative website and the voter interface website. The system as presented for testing and recommended approval allows only for the electronic delivery and marking of the ballot with the option to print and manually mark. Under either scenario the voter will still have to return the ballot to the Supervisor of Elections’ office by U. S. mail or other allowable means, such as fax, for overseas military and civilians known as UOCAVA voters. The system has the option of printing the electronically marked ballot as a voter-verifiable paper output that contains the voter’s choices or as a more traditionally formatted ballot with the voter’s choices marked. The printed ballot may contain a printed QR barcode which allows the returned ballot to be machine duplicated by counties using Runbeck Election Services, Inc.’s Simulo™ automatic ballot duplication system (ABDS) and a ballot-on-demand printer.

On October 24, 2019, Democracy Live submitted an application to the Bureau of Voting Systems Certification (BVSC) requesting approval of its electronic ballot delivery system application, OmniBallot, Version 1.0, for use by counties with Election Systems and Software’s EVS voting systems and Dominion Voting System’s Democracy Suite voting systems. On November 19, 2019, Democracy Live requested that the BVSC, instead, examine its newer OmniBallot, Version 1.1. The State of Florida agreed to test the OmniBallot website application for use as an accessible voting option for the ADA community and for UOCAVA voters.

The test plan for OmniBallot, Version 1.1 was agreed to and signed on December 3, 2019. Preliminary testing and review of the OmniBallot, Version 1.1 documentation, revealed that the website, as deployed, is not currently able to meet the applicable requirements for an administrative user to independently set-up and administer the administrator’s website without vendor support. This requirement is part of the Division of Elections’ Electronic Ballot Delivery System Specifications and Requirements¹ (EBDS Spec) for testing and approval. However, in recognition of the importance of making new voting technologies available, particularly for the ADA community, it has been determined that Democracy Live can successfully provide vendor support to set up and administer the administrative user’s instance of the OmniBallot website.

Therefore, BVSC focused instead on the usability of the published voter interface website application. Democracy Live’s OmniBallot, Version 1.1 successfully met the voter interface functional test requirements. BVSC also reviewed and accepted accessibility testing performed by the states of California and Ohio as evidence that the voter interface met the WCAG 2.0 requirements, and accepted the processing of marked/printed ballots using Runbeck’s Simulo, Version 1.4.7, ABDS from a previous state of Florida test event (as the product was not changed). OmniBallot, Version 1.1 also underwent a security review. Based on the review, it was determined that OmniBallot, Version 1.1 does not introduce significant additional risk into an election, particularly since the system does not allow for electronic ballot return or online voting.

BVSC recommends interim approval of the OmniBallot, Version 1.1 solely as an electronic ballot delivery and marking system for use through March 31, 2022, in counties using the Democracy Suite and EVS voting systems. This interim approval would allow the system to be used with vendor support for administrative website set-up and administration, while providing counties with an opportunity to offer an upgraded electronic ballot delivery and marking system to their ADA voters and UOCAVA voter constituency in the upcoming election cycle. In the interim, this period would allow the vendor to make changes and updates, including but not limited to addressing the requirement for independent set-up and administration in any future submission for extended approval of this system or approval of any future release.
Introduction/System Overview

Democracy Live’s OmniBallot system is a web application available to county elections staff and voters with the use of any web-enabled computer. The system as presented for testing and approval allows solely for the electronic delivery and marking of a ballot or printing a blank ballot and marking choices manually. Under either scenario the voter will have to return the ballot to the Supervisor of Elections’ office by U. S. mail or other means, including fax, as is allowed for overseas military and civilians known as UOCAVA voters. The system consists of two major components – the voter interface website and the administrative website.

The voter interface website allows a voter to log on using name, birthdate, and/or other county-specified data. Once the system authenticates the voter’s credentials, the system retrieves and displays the voter’s proper ballot. The voter has the option to print the ballot for manual marking and the ballot return package or to electronically mark the ballot before printing the marked ballot and the ballot return package. In the latter scenario, the voter marks his/her selection(s) for each contest, including write-ins if they are included on the ballot. After marking is complete, the voter has an opportunity to review contest selections and is notified if any contest has been undervoted. With the electronic marking, the system does not allow for overvoting. For voters with disabilities, compatible assistive voter interface applications can facilitate marking and review of the ballot. Upon voter approval, the ballot is finalized, and the voter is instructed to download the ballot return package. The ballot return package contains the marked ballot, the voter affidavit, and appropriate instructions depending on whether it will be returned by U. S. mail or fax.\(^2\) The system has the option of printing the electronically marked ballot as a voter-verifiable paper output that contains the voter’s choices or as a more traditionally formatted ballot with the voter’s choices marked. The printed ballot may also contain a printed barcode which allows the returned ballot to be machine duplicated for counties using Runbeck Election Services, Inc.’s Simulo automatic ballot duplication system (ABDS) and a ballot-on-demand printer.

The administrative interface website is used to create, maintain, and administer the OmniBallot election database for the county. It allows for the import of exported files from the county’s election management system to create election information and ballots for specific elections. It also allows for the import of voter registration, precinct, and other county data. This website is where the administrative user can custom tailor the voter interface website to include county-specific banners, contact information, ballot return package files, and ballot return method(s). Additionally, this website allows for the ballot to be configured to include a barcode on the marked/printed ballot if the county uses the Simulo automatic ballot duplication system.

Background

In December 2011, Democracy Live first introduced to BVSC a version of LiveBallot™, which is a precursor to the currently submitted OmniBallot website application. Various configurations and upgraded versions of the system have been tested/approved since that time. The most recent approved version is the LiveBallot, Version 3.0.38 which was approved for UOCAVA voters only and continues to be approved for optional use by counties since January 20, 2016.

\(^2\) Fax option is currently only available to overseas military and civilian U.S. citizens.
On March 16, 2018, Democracy Live submitted an initial application requesting approval of a product called Secure Select 1.0, as a stand-alone, accessible vote-by-mail solution. Secure Select is an accessible ballot display tool, designed to meet WCAG 2.0 and Section 508 ADA compliance requirements. After reviewing the supplied documentation, on March 29, 2018, BVSC informed Democracy Live that Secure Select, used alone, did not meet the Electronic Ballot Delivery System (EBDS) requirements for Florida.

In order to resume efforts to secure approval, on April 24, 2019, Democracy Live submitted LiveBallot, Version 3.1, along with their Secure Select 1.0 product. LiveBallot, Version 3.1 was an update to LiveBallot, Version 3.0.38 (approved on January 20, 2016). The main differences between the two LiveBallot versions, were modifications to the data import and mapping functions and updates to the voter interface adding their SecureSelect product in order to provide a more robust accessibility solution.

During the test planning and preparation phase, Democracy Live asked to withdraw LiveBallot, Version 3.1 and Secure Select 1.0 with the intent of submitting their newest product, OmniBallot, Version 1.0 for testing OmniBallot is a complete revision of the LiveBallot application, moving it into a microservices architecture, with a modified method for importing data from the voting system, a new voter interface, and updated instructions detailing how to administer the OmniBallot website. On October 24, 2019, Democracy Live submitted its application for OmniBallot, Version 1.0.

On November 19, 2019, Democracy Live submitted OmniBallot, Version 1.1 to BVSC. The newer version contained improvements that Democracy Live wanted to be included in the state of Florida’s test effort. The test plan for OmniBallot, Version 1.1 was agreed to and signed on December 3, 2019.

**Scope**

This test effort primarily encompassed a usability examination of the published voter interface for Democracy Live’s OmniBallot, Version 1.1, which is a rewrite of their previously approved product called LiveBallot, Version 3.0.38. The system upgrade includes the following:

- Complete revision of the software application platform, moving it into a microservices architecture
- Modified method for importing data from the voting system
- Replacement of the entire voter interface
- Updated instructions detailing how to administer the OmniBallot website

BVSC tested the system for use with the Democracy Suite and EVS voting systems which are currently certified for use in the State.
Conduct of Tests / Findings

BVSC staff examined the use of Democracy Live’s OmniBallot Version 1.1 with the Democracy Suite and EVS voting systems, with primary focus on the usability of published voter interface website application. As mentioned earlier in this report, BVSC did not fully test the functionality of the OmniBallot administrative website application. Some abbreviated tests were conducted, however, to the extent that it was necessary to determine whether the voter interface website application functioned as expected. For instance, it was necessary to review some of the administrative menus, import voter registration data, and interpret the instructions in the OmniBallot Administrative User Guide.

Voter Interface Website Application

In order to use the voter interface website, a voter first needs to request electronic delivery and obtain the URL and the login credentials from his/her Supervisor of Elections. Once the voter has navigated to the URL and logged in to the system, the voter has to follow the instructions as displayed on the computer.

The voter is provided the option to download and/or print and mark the ballot offline or to electronically mark the ballot on the computer screen with or without compatible assistive devices or software. If the voter chooses to print and mark offline, the ballot and the ballot return package are downloaded and printed at the same time. The voter marks his/her choices and prepares the ballot for return by mail in accordance with the instructions in the return package.

If the voter chooses to electronically mark the ballot on the computer, the ballot is displayed and the voter proceeds to electronically mark the ballot. The voter then reviews his/her choices and when ready, approves the ballot. The system has the option of printing the electronically marked ballot as a voter-verifiable paper output that contains the voter’s choices or as a more traditionally formatted ballot with the voter’s choices marked. The ballot output is contingent upon whether the functionality for marking the ballots uses client-side code, meaning the marked ballot is generated locally in the voter’s computer browser, or server-side code, meaning the marked ballot is generated on the vendor’s server and then downloaded to the voter’s computer. Client-side marking produces a voter-verifiable paper output that contains the voter’s choices. Server-side marking of the ballot produces a more traditionally-formatted ballot with the voter’s choices marked on the ballot. Examples of the client-side and server-side ballot output are in Appendix C.

If a voter is an overseas UOCAVA voter, the voter has the option to either mail or fax back the voted ballot to the Supervisor. If a domestic voter, the voter’s only option for return is by mail.

Activities examined for this component of the system

1. Login attempts with invalid voter credentials
2. Login as a voter assigned to a precinct with no ballot for the current election
3. Login with user credentials containing unusual characters

4. Login with very long voter names

5. Verify that a voter could not overvote a contest

6. Verify that a voter could undervote one or more contests

7. Verify that write-in text input lines were properly handled

8. Verify that the voter received the correct ballot return package that corresponds to the correct Vote-By-Mail category (UOCAVA, Overseas voter, Stateside Vote-By-Mail, etc.)

9. Verify that when voters select/request Spanish language ballot and voter instruction translations, OmniBallot properly translates the website and the voter instructions into Spanish

10. Change contest vote selections multiple times

11. Review the voter interface Spanish-language translation using the NVDA\(^3\) screen reader application

12. Conduct regression test with an election configured with a barcode on the printed ballot to ensure that it correctly recorded voter selections and that it did not contain any data which could be used to trace a ballot back to a voter

Findings

1. OmniBallot correctly refused logins with incorrect credentials.

2. The system provided a voter assigned to a precinct with no ballot for the election an appropriate error message and contact information as defined during setup by the election administrator.

3. The system took voters using the correct login credentials to the correct ballot for their precinct in every test case.

4. Ballots were properly marked in accordance with the voter’s selections in every test case.

5. Write-in strings were correctly captured, up to the limit of 30 characters.

6. The system appropriately provided a voter attempting to overvote a contest with an error message and did not allow the overvote.

\(^3\) The NVDA screen reader application allows blind and vision impaired people to access and interact with the Windows operating system and many third party applications. [https://www.nvaccess.org/about-nvda/](https://www.nvaccess.org/about-nvda/) According to the Web Accessibility in Mind (WebAIM) most recent survey, NVDA is the most used screen reader in the disability community. [https://webaim.org/projects/screenreadersurvey8/](https://webaim.org/projects/screenreadersurvey8/) last accessed 5/21/2020.
7. The system appropriately handled undervoted contests by including “flags” on the ballot review screen for each race that was undervoted and allowing the voter the choice to go back to the selection screen and change vote selections as desired.

8. The system presented the voter with the proper ballot return package in each case.

9. For elections, where configuration included a barcode on the printed ballot, the system properly reflected voter selections, including write-in strings and undervoted contests. The barcode did not contain any information which could be used to trace a ballot back to a voter.

10. The OmniBallot voter interface complies with the requirements for disability accessibility. BVSC staff reviewed the accessibility testing which was done by the states of California and Ohio, and accepted their findings that the voter interface meets the WCAG 2.0 standards. Also, in a limited scope, BVSC examined the voter interface using the NVDA screen reader application4 to determine whether the system could properly handle a popular screen reader.

11. When a voter attempts to select the Spanish language option on the Democracy Live website, in general, OmniBallot appropriately translates the website text and the voter instructions into Spanish.5 There were some initial anomalies, however, where the English word was not appropriately translated into Spanish.

- Some items displayed on the website were not translated from English to Spanish. Examples follow:
  o Text on the “return by mail” and “return by fax” buttons
  o Voter Type Selection title and instructions

- Some items displayed on the website did not “match” the language used on the ballot. Example follows:
  o Website instructions for selecting a write-in candidate used the phrase “NO LISTADO” while the ballot language is “Por Escrito”

These items were subsequently corrected during testing.

12. The OmniBallot website’s ballot return package that is created by the system appropriately contains the files provided by the county, such as the fax or mailing instructions, instructions for signing the return envelope, etc., and a marked PDF of the ballot. The ballot PDF can optionally contain a QR barcode, if the county selects that preference when setting up the election, for purposes of using with the prescribed automatic ballot duplication system.

- Once the package has been created, however, there are no instructions displayed explaining to the voter that he/she needs to print the voter return package to send the ballot back to the SOE

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4 NVDA screen reader downloaded from https://www.nvaccess.org/download
5 The contest name, race text, and candidate names are taken from the Spanish-language translation on the ballot. If there is no Spanish language text provided on the ballot, the system uses the English language text from the ballot.
by fax or U.S. mail. This could be confusing to voters who might believe that their ballot has been electronically submitted to the SOE office when it has not.

While the system, if interimly approved, would not allow for electronic return, BVSC recommends that SOE offices using OmniBallot inform their voters that the ballot cannot be and is not returned electronically through the system and that it must be printed and returned. This information could be included in the same communication that relates to login credentials. BVSC also recommends that the vendor or Supervisor of Elections as the administrative user customize the voter interface website to prominently display this reminder.

13. The voter interface has both “client side marking” and “server side marking” when a voter’s ballot is displayed. The “client side marking functionality” is a list of the voter’s choices which when printed will resemble a voter-verifiable paper output with the voter’s choices. The “server side” has the look of a traditional formatted ballot. Both of these options can use the optional QR bar code functionality to assist in duplicating the returned ballot in those counties who have that ABD system. See Appendix C for examples of printed ballot format and content.

**Automatic Ballot Duplication**

All ballots created by the OmniBallot system, either by downloading and marking a blank ballot, or by electronically marking the ballot and then downloading and printing the marked ballot, cannot be fed directly into a tabulator. These returned ballot will have to be duplicated in accordance with section 101.68, Fla. Stat.

BVSC previously tested and approved Runbeck Election Services, Inc.’s Simulo, Version 1.4.7, automatic ballot duplication system (ABDS) for remaking ballots with both the Democracy Suite and EVS voting systems. Since neither the ballots nor the barcode have changed, BVSC did not retest the Simulo, Version 1.4.7, in conjunction with OmniBallot, Version 1.1. BVSC accepts the previous testing and approval. BVSC recommends that county SOE staff and Canvassing Board members closely examine all remade ballots to ensure that voter intent is correctly determined.

**OmniBallot Setup and Administration Website**

One of the requirements of the Division of Elections’ Electronic Ballot Delivery System Specifications and Requirements 6 (EBDS Spec) for testing and approval is that the system allow for an administrative user to independently set up and administer the administration website with reliance on vendor support. Preliminary testing and review of the OmniBallot, Version 1.1 documentation, revealed that the administrative website, as deployed, could not meet that requirement at this time. However, it has been determined that Democracy Live can still successfully provide vendor support to set up and administer the administrative user’s instance of the OmniBallot website while still providing ADA voters and UOCAVA voters in the upcoming election cycle a viable accessible ballot solution through this upgraded and

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6 EBDS Spec, Version 5, March 29, 2018
accessible electronic ballot delivery and marking system. While BVSC did not fully test the functionality of the OmniBallot, Version 1.1 administrative website application, it did conduct some ad hoc tests, to the extent necessary to determine whether the voter interface website application functioned as expected. For instance, it was necessary to review some of the administrative menus, import voter registration data, and interpret the instructions in the OmniBallot Administrative User Guide. BVSC offers the following remarks regarding issues discovered while performing the activities associated with the Administrative website in the course of testing the voter interface. While these issues do not preclude an interim approval, they do represent areas which must be corrected in future releases.

**Election Setup and Administration**

The administrative set-up requires the county user to create/export files from the voting system and from the voter registration system for import, and to create the ballot return package according to instructions in the OmniBallot Administrative User Guide. Through an import process of those exported files, the ballots are created with the respective contests and a cross-check between those files is done. A county must pre-approve all ballot styles, voter registration and other aspects before the vendor can ‘publish’ to its website.

The county user is also responsible for setting up the login credentials and sending the URL to voters and instructions on the requisite credentials

BVSC attempted to use the provided instructions in the Guide to independently set up elections for Democracy Suite and EVS voting systems on the administrative website.

**Findings**

Instructions in the OmniBallot Administrative User Guide were incomplete or not sufficiently clear enough to enable a user to independently and successfully setup and administer an election without vendor support. Specifically, the limitations were as follows:

1. Instructions for exporting the data from the county voting system are unclear.

2. Error messages when importing data into OmniBallot are not meaningful enough for a user to troubleshoot import issues without vendor support.

3. The instructions for mapping the imported data to the appropriate OmniBallot fields are not appropriately clear enough for a user to perform the mapping without training and support from the vendor.

4. There is no list of error messages with appropriate corrective action, either on the site or in the documentation, which would enable a user to troubleshoot errors that occur and the error messages themselves do not provide enough information to determine the cause of the error.

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7 ibid.
5. The requirements for the Voter Registration file, and the instructions for importing the Voter Registration file, are not clear enough that the user could perform the steps required without vendor support.

Additional Security Review

On May 8, 2020, the Cybersecurity and Infrastructure Security Agency, the Election Assistance Commission, the Federal Bureau of Investigation, and the National Institute of Standards and Technology released a joint paper titled “Risk Management for Electronic Ballot Delivery, Marking, and Return.” On June 7, 2020, professors at MIT and the University of Michigan published a paper titled “Security Analysis of the Democracy Live Online Voting System.” Following review of these documents, the Florida Department of State conducted a supplemental security review of OmniBallot, Version 1.1 as presented for testing and approval. The details and results of this review are confidential and security sensitive. Accordingly, the report is documented separately.

Based on the original review, the supplemental security review, and the fact that the system was tested and is recommended for interim approval solely as an electronic ballot delivery and marking system (and not an electronic ballot return or online voting system), it was determined that OmniBallot, Version 1.1 does not introduce significant additional risk into an election and does not preclude recommendation for interim approval.

BVSC also made two other security related recommendations: 1. The ballots should be marked locally in the browser, using the client-side code in lieu of the server side (See Appendix C for examples of printed ballots); 2. The vendor’s privacy policy should be added to their voter interface website.

Improvements

Requirements

During testing, BVSC encountered several challenges that underly BVSC’s recommendation that OmniBallot, Version 1.1 be granted interim approval at this time. The following areas must be corrected for this version or any future releases if they are submitted for testing and approved for use beyond March 31, 2022:

1. Rewrite the administrative procedures so that a user can independently set up and administer an OmniBallot election without support from the vendor.

2. Add detail and clarity to the available error messages, such that the user (i.e. voter and/or election administration official) will know how to correct the error or where they should go for help. An error dictionary or appendix must be added that catalogs common and known errors along with details on how to fix or troubleshoot them.
3. Include the corrected LiveBallot test items that were implemented in previous test efforts, as well as those items that were identified in the Recommendations for Improvement section of the LiveBallot, Version 3.0.38 Test Report.  

**Recommendations**

BVSC highly recommends the following for implementation:

1. While the system, if interimly approved, would not allow for electronic return, SOE offices using OmniBallot should inform their voters that the ballot cannot be and is not returned electronically through the system and that it must be printed and returned. This information could be included in the same communication that relates to login credentials. The vendor or Supervisor of Elections as the administrative user should customize the voter interface website to prominently display this reminder.

2. The county SOE staff and Canvassing Board members must closely examine all remade ballots to ensure that voter intent is correctly determined pursuant to section 101.68, Fla. Stat.

3. SOE offices who choose to use OmniBallot as an ADA / UOCAVA solution may desire to request Democracy Live’s assistance with voter outreach and education in this newly implemented process. The vendor has user guides and promotional boilerplate materials available to provide information to voters regarding the correct use of the OmniBallot system.

4. For additional security-related reasons, the ballots should be marked locally in the browser, using the client-side code in lieu of the server side (See Appendix C for examples of printed ballots). Additionally, the vendor’s privacy policy should be added to their voter interface website.

**Conclusion**

Qualification test results affirm that, in total, Democracy Live, OmniBallot, Version 1.1 does not meet all applicable requirements of Florida Statutes, Administrative Rules and BVSC’s Electronic Ballot Delivery Specifications with regard to the administrative user’s independent setup and administration of an election without vendor support. However, Democracy Live’s OmniBallot, Version 1.1 successfully met the voter interface functional test requirements including complying with the requirements for disability accessibility. In further support of that finding, BVSC had also reviewed and accepted accessibility testing performed by the states of California and Ohio as evidence that the voter interface met the WCAG 2.0 requirements, and accepted the processing of marked/printed ballots using Runbeck’s Simulo, Version 1.4.7, ABDS from a previous state of Florida test event (as the product was not changed).

In recognition of the importance of promoting the availability of new or advanced voting technologies, particularly accessible voting solutions for the interested ADA community, the Bureau of Voting Systems Certification, Florida Division of Elections, recommends interim approval of Democracy Live’s OmniBallot,

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8 See page 8 of the report at: [https://www.dos.myflorida.com/media/695948/test-report-democracy-liveballot-3038.pdf](https://www.dos.myflorida.com/media/695948/test-report-democracy-liveballot-3038.pdf)
Version 1.1 system, to be deployed either alone or in conjunction with Runbeck Election Services, Inc., Simulo, Version 1.4.7, for use with either the Democracy Suite or EVS voting systems, for electronic ballot delivery and marking option for UOCAVA voters and for domestic use by voters who require accessibility features for vote-by-mail ballots. This interim approval is in effect through March 31, 2022. This period of interim approval will allow the vendor to provide vendor support for website set-up and administration, and provide an upgraded electronic ballot delivery and marking option for voters in the ADA voters and UOCAVA voters for this upcoming election cycle. In the interim, this period will allow the vendor to make changes and updates, including but not limited to addressing the requirement for independent set-up and administration in any future submission for extended approval of this system or approval of any future release.
Appendices

Appendix A - Glossary

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<tr>
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Appendix B – OmniBallot - Use in Other States

- California
- Colorado
- Delaware
- New Jersey
- Ohio
- Texas (Military only)
- Vermont
- Washington
- Washington, DC
- West Virginia
Example of client side ballot marking
Example of server side ballot marking
Florida Department of State
Laurel M. Lee
Secretary of State