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April 28, 2022

Wisconsin Elections Commission  
201 West Washington Avenue, Second Floor  
Madison, WI 53703  
*Via email*

RE: Verified Voting Comments on SS 029-22 - Approval and Security of Electronic Voting Equipment and Ballot Security

Dear Members of the Wisconsin Elections Commission:

On behalf of Verified Voting, I submit these comments on SS 029-22. Verified Voting is a nonpartisan nonprofit organization whose mission is to strengthen democracy for all voters by promoting the responsible use of technology in elections. We believe that the integrity and strength of our democracy rely on citizens' trust that each vote is counted as cast.

We support the efforts of the Commission to update existing portions of administrative code related to the approval of electronic voting equipment (EL Ch. 7) and to incorporate additional provisions on the security of electronic voting equipment and ballots. In particular, as the scope statement acknowledges, given increased election security concerns and changes in the broader regulatory environment, it is ever more pressing to make sure that Wisconsin's requirements for the verification and security of electronic voting equipment keep pace with current standards. Since 2021, the U.S. Election Assistance Commission (EAC) has made significant changes to the federal standards for voting equipment through the adoption of the Voluntary Voting System Guidelines (VVSG) Version 2.0 and the VVSG Lifecycle Policy 1.0. The EAC has also published a detailed set of best practices for the chain of custody of ballots and voting systems.<sup>1</sup>

As the Commission drafts this administrative rule, we recommend that it include explicit requirements for testing accessible voting equipment as part of the public pre-election logic and accuracy testing. At its June 2019 meeting, the Commission mandated including ballot marking devices in logic and accuracy testing. Formalizing this requirement in administrative rule is an important next step. The use of ballot marking devices as an accessible voting solution for Wisconsin voters has grown significantly over the past ten years, and it is crucial that pre-election procedures adequately provide for their testing.

Respectfully submitted,

Chrissa LaPorte  
Senior Policy Associate

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<sup>1</sup> U.S. Election Assistance Commission, "Best Practices: Chain of Custody," July 13, 2021.  
[https://www.eac.gov/sites/default/files/bestpractices/Chain\\_of\\_Custody\\_Best\\_Practices.pdf](https://www.eac.gov/sites/default/files/bestpractices/Chain_of_Custody_Best_Practices.pdf)