



U.S. ELECTION ASSISTANCE COMMISSION

633 3rd St. NW, Suite 200

Washington, DC 20001

EAC Decision on Request for Interpretation

2023-04 9.1.5-F Unique Identifier

Sections of Standards or Guidelines:

9.1.5-F – Unique identifier

A paper-based voting system must be capable of adding a unique identifier after a voter casts their ballot.

Discussion

Although not all jurisdictions may use this feature, voting systems are required to have the capability to add a unique identifier to ballots.

Date:

September 29, 2023

Question(s):

1. Would a central-count scanner capable of adding a unique identifier meet the 9.1.5-F requirement?
2. Are precinct-count scanners required to physically mark the paper ballot to meet this requirement?
3. Can this requirement be accomplished procedurally?

Discussion:

The concept of unique identifiers is not new to the latest iteration of the Voluntary Voting Standards Guidelines. In VVSG 1.0, volume 1, requirement 7.9.3.c states: “The electronic ballot image and paper records shall be linked by including a unique identifier within each record that can be used to identify each record uniquely and each record’s corresponding record.” This requirement was focused on the auditability of being able to connect and verify a cast voter record (CVR) with a ballot image. However, this unique identifier did not link to the physical paper ballot. VVSG 2.0 bridges this gap by affixing a unique identifier to the voter’s cast ballot as well as the digital CVR record. Therefore, in a situation where physical paper ballots must be used as a reference, election officials will be able to use the unique identifier to conduct an audit, by linking a physical ballot with the image and CVR as necessary.

Additionally, in VVSG 1.0, volume 1, requirement 7.9.5.f states: “Unique identifiers shall not be displayed in a way that is easily memorable by the voter.” This requirement attempts to take into consideration voter privacy by creating complex identifiers or obscuring them in other characters. VVSG 2.0 does away with the need to obscure unique identifiers on ballots by



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simply affixing them after they have already left the voter's custody. By affixing unique identifiers after a ballot has been cast, no individual can use the identifier to link a voter with their ballot.

This requirement must be met at the time when the cast vote record and a ballot image are created, which is at the time of tabulation. When a ballot is tabulated, whether it be on a precinct scanner or a central scanner, the unique identifier must be added and linked to the ballot, image, and CVR. Therefore, all unique tabulation devices must be capable of adding a unique identifier.

This requirement cannot be met procedurally, as all paper based voting devices, that tabulate ballots, are required to have the capability to add a unique identifier. Addressing this requirement procedurally introduces multiple paths of risk. These risks include: a ballot not being included in the process, ballots being tabulated twice, introducing a procedure that may not be followed, or not being able to tie a CVR with the physical ballot. Instead, to best avoid these risks, human intervention of procedures should be removed from consideration when meeting this requirement.

Conclusion:

To meet requirement 9.1.5-F, all paper-based tabulation devices must have the capability to add unique identifiers. This includes both precinct and central scanners and cannot be accomplished procedurally. Additionally, these unique identifiers must maintain ballot secrecy. No individual should be able to identify a voter's ballot based on the added unique identifier.

Effective Date:

As of the date this document is published.