



State of Hawaii

Project Report

January 8, 2025



U.S. Election Assistance Commission

Field Services Program

633 3RD Street NW, Suite 200 | Washington, DC 20001

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1 Purpose

The U.S. Election Assistance Commission (EAC), in partnership with the Hawaii Office of Elections, performed a review of Hawaii's voting system on July 25-30, 2024. The purpose of this review was to confirm that the system is identical to the system certified by the EAC and leased by the state. With that goal in mind, the EAC set out to (1) observe and verify that the certified Hart InterCivic verification procedures were followed during the review, (2) perform a scope of conformance review of Hart Verity 2.7 as fielded at the Oahu Counting Center, (3) observe, assist, and document a hash verification of a sample of the Hart Verity 2.7 voting equipment that is utilized, and (4) observe physical voting system, facility security, as well as logic and accuracy testing, pre-canvassing procedures, and prescribed best practices utilized during the project.

2 Background

The EAC's Testing and Certification Program assists state and local election officials by providing voting machine testing and certification. This program is a requirement of the Help America Vote Act (HAVA) of 2002, legislation that created the EAC and mandated that the Commission provide certification, decertification, and recertification of voting systems, as well as the accreditation of voting system testing laboratories and quality monitoring of fielded voting systems. This legislation marked the first time the federal government provided oversight for these activities, a step that allowed states to procure new certified voting systems without the added expense of independent testing and certification.

The EAC's Field Services Program (FSP) is tasked with implementing the Testing and Certification's Quality Monitoring Program (QMP). One element of QMP is fielded system conformance reviews, which the EAC may conduct upon invitation, or with permission from the state or local election authority. The purpose of these reviews is to ensure voting systems used by jurisdictions are identical to those tested by the EAC accredited Voting System Test Laboratory (VSTL) and certified by the EAC.

The EAC's Testing and Certification Program is the critical first step in establishing a chain of custody over the voting systems used in our nation's elections. A registered voting system manufacturer that wishes to have their system tested and certified by the EAC must provide their software code to an EAC accredited VSTL for review and testing. The VSTL uses the manufacturer's code to build the system in a secure and safe environment and subsequently test the system against the Voluntary Voting System Guidelines (VVSG). Once testing is completed and the VSTL determines the system conforms with all applicable requirements, the voting system may be certified by the EAC. At this point, the VSTL generates the trusted hash values for the system that will be used later to verify the voting system. This ensures the system that is deployed in any jurisdiction is identical to the system reviewed and tested by the VSTL and certified by the EAC.

Hart InterCivic's Verity Voting 2.7 system was certified and issued a Scope of Conformance by the EAC on June 7, 2022. The Verity Voting 2.7 system utilized by the State of Hawaii includes specific hardware and software components which include an Election Management System (EMS) workstation, central scanners, count workstations, ballot scanners, secure flash drives, and other components of the certified system.



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3 Definitions

Ballot Remake: A ballot substituted for a damaged or partially invalid ballot -- usually remade by a regulated process where the votes from the damaged or partially invalid ballot are duplicated onto another ballot that can be tabulated by a scanner.

Central Scanner: A high-speed, digital ballot scanner typically used at a central count facility or election office to process a high volume of paper ballots. A central scanner uses digital cameras and imaging systems to read the front and back of each ballot, analyze each ballot image, verify ballot validity, and identify marks on the ballot.

Chain of Custody: A process used to track the movement and control of an asset through its lifecycle by documenting each person and organization who handles an asset, the date/time it was collected or transferred, and the purpose of the transfer.

Conformance Review: A conformance review includes documenting all components of a voting system that are utilized and present to ensure that the items are listed on the Scope of Conformance in the EAC's Certification.

Election Management Guidelines (EMG): EMG were created to assist state and local election officials in effectively managing and administering elections. These guidelines complement the technical standards for the VVSG for voting equipment. Each chapter of the EMG is vetted by recognized election experts and offers practical discussions of election issues, including examples and helpful tips including physical security and chain of custody. The EMG's goal is to familiarize election officials with election processes and challenges they will likely encounter during their tenure and is designed to be accessible to election officials at all levels.

Election Management Software (EMS): Set of processing functions and databases within a voting system that defines, develops and maintains election databases, performs election definitions and setup functions, format ballots, count votes, consolidates and reports results, and maintains audit trails.

Engineering Change Order (ECO): A change to a certified voting system's hardware, software, technical data package, or data, the nature of which does not materially alter the system's reliability, functionality, capability, or operation. Such changes require VSTL review and endorsement, and EAC approval.

Hashing: Hashing is the process of computing a unique alphanumeric value on a data file or electronic message such as text, numbers, photos, programs, or files into a fixed-length string of letters and numbers through a mathematical algorithm.

Hash Value: A hash value is a signature that identifies some amount of data, usually a file or message. Cryptographic hashing algorithms are one-directional mathematical formulae designed to generate a unique value for every possible input-in this case, the data. Common algorithms include MDS, SHA-1, SHA-256, and SHA-512.

Hash Verification Review: A hash verification review involves generating the hashes from a voting system component's software and verifying those hashes against a trusted source. This review provides assurance that the system is the same as what was certified by the EAC and that there has been no manipulation of the program files.



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Logic and Accuracy (L&A) Testing: Ensures the election and voting equipment function as expected and accurately count votes as marked.

Official Observer: Members of the public designated by the chief election officer or clerk to monitor operations at the counting center.

Pre-Canvassing: The inspection and opening of all envelopes containing official mail ballots, the removal of such ballots from their envelope and the counting, computing and tallying of the votes reflected on the ballots. The term does not include the publishing of the votes reflected on the ballots.

Sample Review: A review of a select number of parts or devices from a voting system and its components. This review offers a representative evaluation, providing a solid basis for drawing a conclusion about the overall system.

Scope of Conformance: Documentation created by the EAC at the end of the testing and as part of certification. This document details the configuration of the system that underwent testing and can be used as a checklist in evaluating a fielded system.

Technical Data Package (TDP): Manufacturer documentation relating to the voting system, which can include manuals, description of components, and details of architectural and engineering design.

Voluntary Voting System Guidelines (VVSG): A set of specifications and requirements against which voting systems can be tested to determine if they meet required standards. Some factors examined under these tests include functionality, accessibility, and security capabilities. While HAVA mandates the EAC to develop and maintain these requirements, adhering to the VVSG is voluntary except in select states where it is required by their own state law.

Voted Ballot Container (VBC): An identifiable securable box used to transport and secure voted ballots within the counting center.

Voted Ballot Container (VBC) Processing Teams: track and secure voted ballot containers (VBC's) to and from the scanner stations for counting.

Voting System Testing and Certification Program Manual: The primary purpose of this manual is to provide clear procedures to manufacturers for the testing and certification of voting systems to the VVSG consistent with the requirements of HAVA Section 321(a)(1).

4 References

- A. [EAC Scope of Conformance issued on June 7, 2022](#)
- B. [EAC Testing and Certification Program Manual](#)
- C. Verity System Administrator's Guide, Version 2.7
- D. Verity Knowledge Base, Hash Testing for Verity Software and Devices
- E. [Help America Vote Act \(HAVA\)](#)
- F. [EAC's Election Management Guidelines](#)



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- G. [EAC Chain of Custody Best Practices](#)
- H. [Voluntary Voting System Guidelines Version 1.0 \(2005\), Volume 1](#)
- I. [Hawaii Office of Elections, 2024 Elections, Counting Center Procedures](#)

5 Participants

5.1 U.S. Election Assistance Commission

- Thomas Freitag, Field Services Specialist
- Dan Cox, Field Services Program Manager
- Thomas Hicks, Commissioner

5.2 Hawaii Office of Elections

- Scott Nago, Chief Election Officer
- Aulii Tenn, Counting Center Operations
- Matthew Schaefer, Computer Services
- Office of Elections' staff

5.3 Hart InterCivic

- Neal Kelley, Hawaii Statewide Project Manager
- Tom Bride, Hawaii Ballot Production Manager

5.4 Official Observers

- Multiple members of the public

5.5 Ballot Opening Teams

- Multiple members of the public

5.6 Voted Ballot Container (VBC) Processing Teams

- Multiple members of the public

6 Roles

6.1 U.S. Election Assistance Commission (EAC)

The EAC provided project scope, guidance, and coordination for the fielded system review which included providing technical assistance and information to the Hawaii Office of Elections. During the first part of the fielded system review, the EAC staff conducted a conformance review on a sample of selected voting system devices at the Oahu Counting Center to ensure conformance with the EAC certification. Secondly, the EAC observed and documented the results and processes used during voting system hash verification.



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Lastly, the EAC observed and noted best practices such as voting system and facility security measures, L&A testing, ballot chain of custody, pre-canvassing, policies, and procedures.

6.2 Hawaii Office of Elections

The Hawaii Office of Elections provided technical resources and expertise needed to conduct the review as well as access to voting equipment and facility. In addition, they provided Hawaii computer services staff, USB drives as needed to perform hash verifications on the equipment, and access to a non-Hart workstation to conduct the hash verification review. During the conformance and hash review the state oversaw all systems' chain of custody, in particular to maintain election equipment integrity, and provided guidance and support, as necessary. The state oversaw the L&A testing of central scanners & count workstations, managed the ballot chain of custody, and supervised the pre-canvassing of voted ballots. Furthermore, Hawaii Office of Elections' staff provided the EAC with detailed information on their election processes and the use of their voting system.

6.3 Hart InterCivic

Hart InterCivic partnered with the EAC and the Hawaii Office of Elections during the review process. They provided training prior to the review on how to perform hash verifications in accordance with their EAC approved procedures to the Hawaii Office of Elections. In addition, they provided additional onsite technical expertise and customer support during the entire process. Throughout L&A testing and pre-canvassing they performed ballot scanning under the oversight of the Hawaii Office of Election, while monitored by official observers. Scanned ballots were labeled and given a coded sticker by Hart Technicians to verify a batch had been scanned.

6.4 Official Observers

Designated members of the public known as official observers participated in the Official Observers' Test, a public L&A test of voting equipment at the Oahu Counting Center, conducted by the Hawaii Office of Elections. Official observers marked test ballots in any manner of their choosing, scanned the test ballots with the assistance of Hart Technicians, and reconciled their tally of expected results with the voting equipment results. Official observers accompanied Hawaii Office of Elections' staff from ballot pick up to delivery at the Oahu Counting Center. Official observers monitored the handling and transfer of ballots. At the Ballot Opening work area, this included unsealed containers of return envelopes as they awaited processing and VBC's transferred to the VBC Processing Team to scan. During ballot opening, official observers also confirmed that the return envelopes and secrecy sleeves are empty, so no ballots were accidentally discarded.

6.5 Ballot Opening Teams

The Ballot Opening Team opened and packed ballots for scanning. The Ballot Opening Team removed the content of the return envelopes. Empty return envelopes were collected, checked, and packed for retention. The Ballot Opening Team removed the ballots from secrecy sleeves, unfolded them, and placed them into a voted ballot container (VBC) for transport and storage. Empty secrecy sleeves were also checked to confirm they were all empty. VBC's were transferred to the VBC Processing Team for scanning.

6.6 Voted Ballot Container (VBC) Processing Teams

Ballots that were ready for counting were transferred to the VBC Processing work area. VBC Processing Teams tracked and secured VBC's to and from the scanner stations for counting. The VBC Processing



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Team brought one VBC at a time to each scanner station. Once the ballots in a VBC were scanned, they were marked as counted and returned to the VBC Processing Team for secure storage. Each VBC is tracked as it is transferred to and from the scanner to ensure ballots are only scanned once.

7 Scope of Review

The scope of review covers what the EAC will examine, how it will be examined, and the objectives to be achieved during the review process of this project. The scope of review provides the foundation on which results were obtained and observations or recommendations will be provided.

7.1 Device Sample Size

A sample of equipment to be inspected was agreed upon by the EAC in partnership with Hawaii Office of Elections. This included the Island of Oahu's Verity Count tabulation system, five Verity Central high speed scanning stations, Verity Relay Receiving stations, Verity Transmit Receiving stations, Verity Data, and Verity Build. In addition to the equipment reviewed by the EAC, the Hawaii Office of Elections reported that they performed hash verifications of all other equipment during acceptance testing on May 23, 2024.

7.2 Confirm Application of Hart InterCivic Certified Procedures

Observe and document the verification procedures applied during the review by the Hawaii Office of Elections are identical to the certified Hart InterCivic verification procedures as published in the TDP.

7.3 Voting System Conformance Review

During the conformance review process in Hawaii, the EAC reviewed and verified the sample of the Verity Voting 2.7 voting system devices used at the Oahu Counting Center to ensure they fall within the EAC's Scope of Conformance as certified on June 7, 2022, and any other changes to the system configuration made through an engineering change order (ECO), if applicable.

7.4 Hash Verification Review

The EAC observed and documented the setup of a non-Hart computer for the use of a verification comparison tool for export of USB flash drives used in the verification process. The EAC observed and documented the results of the hash verification performed by the state on the Verity Central, Verity Relay Receiving, Verity Transmit Receiving, Verity Data, and Verity Build stations including serial numbers of the equipment and USB's while noting the roles, protocols and procedures used throughout the process.

The hash verification procedure used during the review followed the system verification instructions created by Hart InterCivic under the Voluntary Voting System Guidelines (VVSG) 1.0 as certified by the EAC and outlined in the Verity System Administrator's Guide and Knowledge Base documentation.

7.5 Physical Voting System and Facility Security Observations

The EAC observed physical voting system and facility security processes and procedures implemented by the Hawaii Office of Elections to ensure that they meet industry best practices, as outlined in the EAC Election Management Guidelines, and are adequate to ensure robust security of the voting system and facility. Specific measures observed included the use of tamper-evident seals, restricted access to sensitive areas, and documented chain-of-custody protocols.



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7.6 Pre-Election Procedure Observations

The EAC observed pre-election day procedures such as L&A testing, the chain-of-custody for returned ballots, and the pre-canvassing of voted ballots by the Hawaii Office of Elections. These procedures were reviewed to ensure they meet industry best practices, as outlined in the EAC Election Management Guidelines, the EAC Chain of Custody Best Practices Guide, and Hawaii's Counting Center Procedures. The processes were found to be adequate for maintaining robust accuracy of the voting system and secure custodial oversight of returned ballots. Specific measures observed included detailed tracking logs, transparency in procedures, and thorough validation of equipment functionality.

8 Results and Observations

8.1 Hart InterCivic Certified Procedures

All system verification procedures followed by the Hawaii Office of Elections were observed by EAC personnel to ensure compliance with Hart InterCivic's TDP as certified by the EAC.

8.2 System Conformance

8.2.1 Verity Central Stations

Five Verity Central Stations at the Oahu Count Center were reviewed, and the model numbers matched scope of conformance. All proprietary and commercial-off-the-shelf (COTS) components for each workstation, high speed scanner, and printer were reviewed, found to be functional, and within scope of conformance.

8.2.2 Verity Count Station

The standalone workstation was reviewed for conformance, and the model number matched scope of conformance. All proprietary and COTS software and hardware was reviewed, found to be functional, and within scope of conformance.

8.2.3 Verity Data and Build Stations

The standalone workstation was reviewed for conformance, and the model number matched scope of conformance. All proprietary and COTS software and hardware was reviewed, found to be functional, and within scope of conformance.

8.2.4 Verity Relay Receiving Station

The standalone workstation was reviewed for conformance, and the model number matched scope of conformance. All proprietary and COTS software and hardware was reviewed, found to be functional, and within scope of conformance.

8.2.5 Verity Transmit Receiving Station

The standalone workstation was reviewed for conformance, and the model number matched scope of conformance. All proprietary and COTS software and hardware was reviewed, found to be functional, and within scope of conformance.



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8.3 Hash Verifications

8.3.1 Workstations and Election Management Software

All workstations and Election Management Software were reviewed, the hashes were generated and then verified against trusted hashes the Hawaii Office of Elections obtained from the EAC. Field Services Program staff observed as hashes were generated and compared. Hashes for the workstations were confirmed using Hart Verity Voting 2.7's method of verifying outlined in its TDP. No discrepancies were identified.

The serial numbers of the equipment reviewed are detailed below.

Table 1: Verity Workstations by Serial Number

Device Type	Serial Number
Verity Central Workstation	D2100287206
Verity Central Workstation	D2000254909
Verity Central Workstation	D2100286306
Verity Central Workstation	D2000254209
Verity Central Workstation	D2100287106
Verity Count Workstation	D2100286906
Verity Data/Build Workstation	D2100285106
Verity Data/Build Workstation	D2000254409
Verity Relay Receiving Workstation	D2100286106
Verity Transmit Receiving Workstation	D2100286206

8.4 Physical Voting System and Facility Security Observations

8.4.1 Oahu Counting Center and Voting System Security

The Oahu Counting Center had restricted access to the building and sensitive voting system equipment, and work areas. All visitors to the building were subject to security screening. Members of the public such as official observers, Ballot Opening Teams, and VBC Processing Teams were required to sign physical security logs and were issued colored name badges. Personal items such as bags, electronic devices, food, and drink were required to be surrendered prior to entrance to the Counting Center. All election staff were identifiable by uniform and badges. Sensitive access keys and critical data storage media are restricted to certain employees. Unused access ports on equipment used tamper proof port blockers or seals to prevent unauthorized access. A Sheriff's Deputy was also stationed outside the Counting Center doors during L&A and pre-canvassing. The staff demonstrated a high level of attention to their security protocols and are aware of the importance of facility and voting system security.

8.5 Pre-Election Procedure Observations

8.5.1 Ballot Chain of Custody

Stringent chain of custody procedures were observed at the Oahu Counting Center, following the guidelines outlined in the Hawaii Counting Center Procedures manual, which closely align with those in the EAC Election Management Guidelines and the EAC Chain of Custody Best Practices guide. This included the L&A official observer's testing where official observers received sealed test decks,



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previously marked by the observers, and compared results after scanning to ensure accuracy. Tracking logs were completed by election staff to ensure that all test ballots in the test deck were accounted for prior to observers signing out. During the pre-canvass of voted ballots, each VBC was meticulously tracked through the use of a VBC Time Log. Processing teams transferred VBC's one at a time to scanner stations, handled by Hart Technicians. After scanning, VBC's were labeled, sealed, and secured in cages. Additionally, official observers accompanied election staff during all ballot transports, ensuring continuous oversight and verification of chain of custody throughout the process.

8.5.2 Prescribed Procedures and Best Practices

Hawaii's Counting Center Procedures Handbook incorporates many best practices detailed in the EAC's Election Management Guidelines, ensuring a secure and transparent election process. Key practices include stringent chain of custody protocols, comprehensive Standard Operating Procedures (SOPs), and rigorous staff training to maintain consistency and integrity throughout the election. In line with EAC best practices, it incorporates guidelines on ballot physical security and digital access to voting systems and other practices used to ensure both transparency and accuracy. Both sources also stress pre-election testing and post-election audits to ensure that voting systems are accurate, secure, and transparent, helping to maintain trust in the electoral process. Additionally, both emphasize ballot remake procedures, where defective ballots are duplicated one for one under the oversight of multiple election workers and supervision of observers to ensure accuracy and integrity. These comprehensive measures demonstrate Hawaii's commitment to following industry standards for election management.

8.5.3 Pre-Visit Testing and Scanner Sealing Procedures

Prior to the commencement of the FSP's arrival, the Hawaii Office of Elections conducted additional hash testing on July 5, 2024. This procedure, conducted in accordance with Hart InterCivic's certified processes, involved generating and verifying hash values for the Verity Central Scan stations. The verified hashes were compared to trusted EAC-certified hashes, ensuring the integrity and consistency of the deployed system. No discrepancies were noted during this process, affirming that the voting systems hash values were identical to those provided by the EAC.

Additionally, on July 6, 2024, the precinct counters used at the voter service centers were sealed by election officials, with official observers present to monitor the process and sign off on seal certification paperwork. Each scanner was secured with tamper-evident numbered seals and logged accordingly, further ensuring the integrity of the system. This process, outlined in the Hawaii Counting Center Procedures, helps ensure that no unauthorized access or tampering occurred before Election Day. The presence of official observers throughout the sealing process, as well as their oversight of the system's operation, exemplifies Hawaii's commitment to transparency and security in election administration. Though these procedures were completed prior to the FSP's arrival, their consistent documentation is integral to ensuring the transparency and security of Hawaii's election processes.

9 Suggestions

9.1 Hash Verification Program

The EAC suggests that the Hawaii Office of Elections implement a hash verification program to regularly conduct hash verifications including during pre-election and post-election testing of voting system devices.



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9.2 Local Law Enforcement

The EAC suggests that, in addition to the presence of official observers during the transport of ballots to counting facilities, local law enforcement officers also accompany the transport. This recommendation is made out of an abundance of caution, given the heightened threats to election infrastructure in recent years.

10 Conclusions

The Hart Verity Voting 2.7 procedural, conformance, hash, and security review conducted July 25-30 yielded no findings, observations, or issues that could potentially impact the security of the system as deployed. All Hart InterCivic system verification procedures, as certified, were followed during the review. The EMS workstations and scan stations reviewed fell within either the original Scope of Conformance or applicable ECOs. The Verity Central, Verity Count, Verity Data and Build, Verity Relay Receiving, and Verity Transmit Receiving Workstation hashes were reviewed and all matched the EAC trusted hashes in accordance with Hart Intercivic's EAC certified verification procedures. The Hawaii Office of Elections voting system, L&A testing, facility security, and counting center procedures during the review appear to be comprehensive and thoroughly followed. Therefore, the EAC can independently confirm that the software extracted is equivalent to, and the hardware inspected is consistent with, the Scope of Conformance issued by the EAC for the Hart Verity Voting 2.7 voting system on June 7, 2022. Hawaii has successfully taken on a critical security tool with hash verification and is successfully standing this up as a pre- and post-election practice.

11 Recognition

11.1 Hawaii Office of Elections

The EAC's Field Services Team would like to recognize and thank Chief Election Officer, Scott Nago, and Counting Center Operations Manager, Aulii Tenn, from the Hawaii Office of Elections and Computer Services Technician, Matthew Schaefer, from Hawaii's Computer Services Office, for helping facilitate this project and providing vital resources and staffing to ensure a successful review. Their leadership and dedication to ensure that Hawaii's elections are safe, secure, accurate, and accessible is noteworthy. When presented with this opportunity several months ago they immediately recognized the value and opportunity a project like this was for their state, and their proactive engagement is recognized. We would also like to extend our gratitude to the rest of the Hawaii Office of Elections' staff for their active participation and support throughout the process. We look forward to future projects with the Office of Elections in the State of Hawaii.

11.2 Hart InterCivic

The EAC's Field Services Team would also like to thank Neal Kelley and Tom Bride and the rest of the staff at Hart InterCivic for the training and technical expertise they provided to the Hawaii Office of Elections staff prior to and during the project. Their customer support and partnership with Hawaii helped ensure the review process went smoothly and that in the event Hawaii Office of Elections' staff had any issue, they would be there to assist.

11.3 Official Observers and Volunteers

The EAC's Field Services Team would like to recognize and thank the many members of the public who served as appointed and volunteer positions for their critical contributions to the election process in Hawaii.



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Their dedication and commitment to ensuring transparency by acting as the “eyes and ears” of the public help to uphold the security and integrity of the election. Their role in supporting these efforts is invaluable and aids the public trust in the election system. We commend their service in helping to maintain a secure and transparent election process.