

	iBeta Quality Assurance- NVLAP Lab Code 200749-0	Issue Date:	Version:
		1/2/07	1.0
Title:	Response to the NVLAP 12/14/06 Audit		Page #:
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The purpose of this document is to provide a reponse to NVLAP for the issues identified in the 12/14/06 audit.

Item Types: X= Non-Compliance, C= Comments

Resolutions are provided for all Non-compliance items. Responses or resolutions are provided for optional Comment items. Responses include a description of the action taken, supporting document names and the specific sections of the documents. In some instances 'Statements of Response' are included to provide clarification. The supporting documentation of the responses are delivered in a set of folders traced to the specific Audit Item Number.

- Item Numbers 1-G thru 7-G, 9-G thru 19-G, and 22-G have supporting documents.
- Item Numbers 20-G and 21-G have 'Statements of Response' which address these items.
- There was no Item Number 8-G delivered to iBeta.

Item	Issues Identified	Response to NVLAP
X 1-G	4.1.6 - Not addressed in the "iBeta Quality Policy"	Added weekly meetings to the Quality Policy Quality Policy (v.3.0) Section 4.1.6 has been added to the Quality Policy. The weekly meetings are documented in the previously submitted Review of Contracts Procedure 6.3.1.
X 2-G	4.2.2 e) - No words in the quality policy statement nor the employee handbook to address this at the top level	Added a statement to the Quality Policy Quality Policy (v.3.0) Section 4.2.2 has been augmented to concisely state that the testing is conducted in accordance with stated methods and client requirements.
X 3-G	4.2.3 - Not addressed in the "ibeta Quality Policy"	Added detail to the Quality Policy Quality Policy (v.3.0) Section 4.2.3 has been augmented to document the current process (Action Plan Procedure) for continually improving the effectiveness of the QMS.
X 4-G	4.2.5 a) - Business vertical procedures need to be added to 2.3 of the Quality Policy which is referenced in 4.2.5 of the Quality Policy	List is provided and the Quality Policy is updated Quality Policy (v.3.0) Section 2.3 and 2.4 have been updated to include the file structure of the voting business vertical and the voting standards, respectively.
X 5-G	4.5.1 -Clause 6.1.2 of the iBeta procedure "Subcontracting" states the term "independent subcontractor or contractor" where subcontractor is not consistent with 17025/150. The term "contractor" is defined in the iBeta procedure "Subcontracting" and is appropriate for clause 6.1.2 but "subcontractor" is defined as an "accredited lab" and is not appropriate for clause 6.1.2.	Removed the word 'subcontractor' Subcontracting Procedure (v.3.0) Removed the term "independent subcontractor" from the Subcontracting procedure in section 6.1.
X 6-G	4.6.4 b) - No evidence of an approved vendor list was available	List is provided and the Equipment Procedure is updated Equipment Procuring, Handling, and Validation Procedure (v.3.0)



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		<p>This procedure has been updated to reflect the iBeta Approved Vendor List 12-13-06</p> <p>Table 1: Internal Documents 4: Responsibilities for Purchase Agent</p> <p>Task 6.1.2 #2a – Purchase Equipment</p>
C 7-G	<p>4.7.1 - The procedure called "Review of Contracts" covers this issue as well as Paragraph 4.7.1 in the Quality Policy. The 2005 version of ISO/IEC 17025 changed the word "client" to "customer" and this is consistent with NIST Handbook 150 (2006 version) where the term customer is defined but client is not defined.</p>	<p>Statement of Response: iBeta uses the term "client" as an equivalent of "customer". It is the commonly used term in iBeta documents. The term 'client' is defined in the previously submitted 'iBeta Glossary'. The term 'client' is used in the 'Customer Satisfaction Guarantee' and 'Customer Satisfaction Interview' definitions.</p>
X 9-G	<p>5.2.5 c) – 150-22 – 5.2.6 - The competency review program is not documented fully in the Voting Training Procedure</p>	<p>Added detail to the Training and Training Records Procedure</p> <p>Voting – Training and Training Records Procedure (v.2.0) Augmented Section 6.3.2 to enhance documentation of the annual competency review program.</p>
X 10-G	<p>5.4.1 a) Some minor references but there is no apparent description of validation techniques. In the format used, this may be difficult as it needs to be done on a test case basis in each test campaign. Note: iBeta uses the term "proof of concept" for "validation" The testing procedures are very complete in coverage but lack the form appropriate for identifying as methods. For example, the security requirements require a specific test which should be in a methods type format to support transparency of the testing . Accessibility, Accuracy and/or Reliability, and others also need to be explicit methods. Within the test cases, a section exists for pre-requisite conditions relevant for the test case. It is expected that this will contain relevant information. The QP includes the copied statement but could not find evidence that it is being done or understood</p>	<p>Added Test Methods and Test Method Validation</p> <p>Test Method Template (Form A) Created the test methods for all testing.</p> <p>FCA Test Case Preparation and Execution (v.2.0) Added Test Method detail</p> <p>Tables 1 & 5: Test Methods template 4: Responsibilities for Test Methods</p> <p>Task 6.1.2, Customize Test Method template based on FCA Doc Review 6.2.1.1ev, 6.2.2.3a, 6.2.3.2a, & 6.2.4.1a Incorporation of Test Method for each Test Case</p> <p>FCA Test Planning Procedure (v2.0) Added detail for Test Methods</p> <p>Tables 1 & 5: Test Methods template 4: Responsibilities for Test Methods 6: Test Method document control 7: Validation of Test Method (quality control)</p> <p>Tasks 6.2.3- Preparation of the Test Method for inclusion in the Test Plan 6.3.1- Validation of the Test Methods</p>



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		<p>FCA Security Review (Form A) Review form for security documentation requirements</p> <p>VSTCA Test Plan Template (Form C) Appendix – Test Methods: added insertion of Test Methods</p> <p>VSTCA Test Report Template (Form C) Appendix D: added insertion of Test Methods</p>
X 11-G	5.4.2 a) , The system uses combinations of test cases and templates, not methods. The lab recognizes and has developed test procedures for non-standard methods but need additional work on establishing a program for validating the “method” procedures they use. Some records are included for specific test cases.	See 10-G
X 12-G	5.4.5 - Some minor references but there is no apparent description of validation techniques. In the format used, this may be difficult as it needs to be done on a test case basis in each test campaign. Note: iBeta uses the term “proof of concept” for “validation” The testing procedures are very complete in coverage but lack the form appropriate for identifying as methods. For example, the security requirements require a specific test which should be in a methods type format to support transparency of the testing . Accessibility, Accuracy and/or Reliability, and others also need to be explicit methods.	<p>Statement of Response: Certification testing is an examination of the hardware, software and procedures for operation of elections as required by the EAC VSS/VVSG guidelines. The specific tests to examine the voting system are specified by the EAC in the guidelines. The iBeta Test Method defines ‘how’ we will perform the tests stipulated by the EAC. They are incorporated into the Certification Test Plan. The ‘EAC Voting System Test and Certification Program Manual’ requires submission and approval of the Test Plan by the EAC Program Manager. The EAC Program Manager assigns an expert reviewer to determine the acceptability of the Certification Test Plan. This is the validation of the test method. The approval or disapproval issued by the EAC Program Manager is documentation of the results and the statement of validation of the of the iBeta Test Method. If the Certification Test Plan is not accepted by the EAC Reviewer the Project Manager will work with the Reviewer to identify how to modify the Test Method to gain acceptance, approval and validation. EAC responses are retained as part of the test record.</p> <p>Added detail to the FCA Test Planning Procedure</p> <p>FCA Test Planning Procedure (v.2.0) Added detail for Test Method Validation Tables 7: Validation of Test Method (quality control) Tasks 6.3.1 #2- Validation of the Test Methods</p>
C 13-G	5.4.3 - The development is based on each test campaign in the form of the Template process (Proof of Concept) and as stated in Test Planning, Execution, and Recording of Results, is used more as a selection technique than as a process needed for all but nationally validated test methods. Even in these cases, a validation is expected to verify the ability to perform the test	See 12-G



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	method.	
X 14-G	5.4.5 - Some minor references but there is no apparent description of validation techniques. In the Format used, this may be difficult as it needs to be done on a test case basis in each test campaign	See 12-G
X 15-G	Annex A – No words in the policy or procedure that are apparent to cover the NVLAP logo issue	Added Annex A to the Project Management Procedure Voting VSTCA Project Management Procedure (v.2.0) Section 6.2.3 has been augmented to include the logo/symbol requirements of NIST Handbook 150 Annex
C 16-G	5.10.2 c) -Confirmed in Report Template, Report carries a version number but not unique number except the certification number which not issued until the report is approved Create unique number for report independent of the certification number	See 22 G
C 17-G	5.10.2 e) - These reports involve multiple methods. And will need to have this addressed in contract, test plan, and report	See 10-G
C 18-G	5.10.2 f) - need to add condition of equipment to the test equipment directory	Added 'condition' to the test environment hardware description VSTCA Test Report Template (Form C) Table 7: Voting System Hardware added 'condition' to the Description column.
X 19-G	5.10.3.1 – Not Specified	Clarified the language in the template to specify "deviations". VSTCA Test Report Template (Form C) Section 5 Certification Test and Review instruction: In the following section, identify any deviations from the standard test method. If appropriate insert a similar statement in the relevant appendix.
C 20-G	5.10.6 c) - Add: New requirement from EAC Cert Manual that all certification records, including some email and fax, shall be transmitted by secure carrier, or, if electronic, encrypted and digital signature.	Statement of Response: The EAC Voting System Testing and Certification Program Manual, v.1.0 effective 1/1/07, addresses electronic delivery to the EAC but does not stipulate requirements for encryption or digital signature. (section 1.9 <i>Any documents submitted pursuant to the requirements of this Manual shall be submitted: 1.9.1. If sent electronically, via secure e-mail or physical delivery of a compact disk, unless otherwise specified.</i>) Upon application as a VSTCA iBeta shall request a clarification from the EAC of the encryption and digital signature requirements. An appropriate action plan will be initiated to comply with all EAC requirements.
C 21-G	5.10.7 - Add: New requirement from EAC Cert Manual that all certification records, including some email and fax, shall be transmitted by secure carrier, or, if electronic, encrypted and digital signature.	See 20-G
X 22-G	5.10.9 – There is a need to identify a unique test report number for amendments.	Added a unique number to the report VSTCA Certification Test Report procedure (v.2.0) 6.2.3 #1.d Unique number report and how to revise VSTCA Test Report Template (Form C)

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