



**ALEX PADILLA** | SECRETARY OF STATE | STATE OF CALIFORNIA  
OFFICE OF VOTING SYSTEMS TECHNOLOGY ASSESSMENT  
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September 4, 2020

Aaron Nevarez  
Los Angeles County  
12400 Imperial Highway,  
Norwalk, California 90650

Dear Mr. Nevarez,

On Monday, March 16, 2020, the California Secretary of State's Office of Voting Systems Technology Assessment (OVSTA) received a request for Administrative Approval request from the County of Los Angeles to make code changes to the Voting Solutions for All People (VSAP) Interactive Sample Ballot (ISB) 1.2 remote accessible vote by mail system. The code changes impacted the following categories:

- Error handling
- Improved navigation
- Data consistency
- User interface improvement
- Improved language support
- iOS support

The changes to the VSAP ISB 1.2 remote accessible vote by mail system were tested and verified by our office. Our office recruited testers from the accessibility community, and in conjunction with those testers, Functional and Accessibility testing were conducted. A review of the VSAP ISB system also included Software testing (source code review), and Security and Telecommunications testing by a state approved testing authority, SLI Compliance, a division of Gaming Laboratories LLC.

California Elections Code section 19291 precludes a remote accessible vote by mail system that has been approved by the Secretary of State from being changed or modified until the Secretary of State has determined the change "does not impair its accuracy and efficiency...."

If the Secretary of State determines the change or modification does not impair the accuracy or efficiency of the remote accessible vote by mail system, the Secretary of State may administratively approve the proposed change or modification. Each respective phase of testing demonstrated that the changes to the system do not impair its accuracy or efficiency pursuant to California Elections Code Section 19291.

The changes to the system warrant a version number change, and thus the system is now VSAP ISB 2.5.

Based on the application, change notes, testing performed and a review by the state approved testing authority, this Administrative Approval is granted for VSAP ISB 2.5. All other conditions of the VSAP ISB 1.2 remote accessible vote by mail system certification, dated January 29, 2020, remain in effect.

A handwritten signature in black ink, appearing to read "Susan Lapsley" with a stylized flourish at the end.

Susan Lapsley  
Deputy Secretary of State, HAVA & Counsel