

Non-Voting System Approval Process & Partitioning Requirements for Elections Infrastructure

Elections Clearinghouse Notice

Issue #25-07

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This clearinghouse notice is issued to reflect legislative changes adopted in [Engrossed Substitute Senate Bill 5014 \(2025\)](#) relating to election security.

Background

The voting system, defined in [RCW 29A.12.005](#) and the [Help America Vote Act \(HAVA\) Section 301](#), is the software and equipment used to cast and count ballots and report vote tallies; however, the voting system does not encompass all the software and hardware used to administer an election. County auditors may utilize software and hardware to provide accessible and secure tools for voters to receive accessible ballots, respond to notices, or verify their identity. [RCW 29A.12.050](#) provides that the Secretary of State must approve of systems used in the conduct of elections prior to being used in a primary or election.

Scope of Systems Requiring Secretary of State Approval

Prior to use in conducting any primary or election, the Secretary of State must approve systems used in the conduct of elections, including:

- Online Accessible Ballot
 - Other than the system, DemocracyLive OmniBallot, provided by OSOS
- Ballot On Demand Systems, including when used for ballot duplication
 - Except those Ballot On Demand Systems that are included in the voting system certification.
- Notice Response
 - Other than the VoteWA system provided by OSOS
- Signature Curing or Capturing
 - Other than the VoteWA system provided by OSOS
- Fraud Detection or ID Verification
 - Other than the system, LexisNexis, provided by OSOS
- Automated Verification Systems ([RCW 29A.40.110](#))
- Alternative to Signature Verification Pilots ([RCW 29A.40.111](#))

Non-Voting System Approval Process

Any vendor or county auditor requesting approval of a system for use or purchase in the conduct of elections must complete and submit a written request to the Office of the Secretary of State. The request must include the system details, how it will be used in the administration of elections, and any other information the county auditor or vendor determines is appropriate. The Office of the Secretary of State shall coordinate its review of the system with the vendor.

Prior to approval, the Secretary of State will determine if there is a federal or state requirement that the system must integrate with VoteWA and/or the accountability processes implemented by the county.

An agreement by a county auditor to purchase any system is subject to that system passing an acceptance test that demonstrates the system operates as it did when it was approved by the Secretary of State.

The minimum acceptance test standards are listed below:

- Any hardware must be the same model number certified by the Secretary of State.
- The County Auditor must receive all training and manuals necessary for the proper operation of the system.
- If the system integrates with VoteWA, the County Auditor must perform a series of tests to verify the system integrates with VoteWA and accountability processes successfully.
- The County Auditor must include the Office of the Secretary of State when the system is being integrated with VoteWA and has not been previously approved.

After the approval of the system, the Office of the Secretary of State will issue a written approval report that specifies the approved use of the system, conditions of its use, and if the approval is statewide or county-specific.

This approval may be withdrawn if, at any time after approval, the Secretary of State determines that the system was materially misrepresented during the approval process, the vendor fails to disclose to the Secretary of State any breach of the security of its system immediately following discovery of the breach, or the system fails to comply with federal or state law.

The version number of the software at the time of approval must be included in the approval documentation. After approval, changes to the system, such as release notes, must be reported by the vendor to the Secretary of State.

Requirements for Ballot Issuance Systems

Any system used to issue an online accessible ballot or online markable ballot must interface with VoteWA in compliance with [RCW 29A.40.130](#).

Requirements for Notice Systems

Any system used to respond to a required notice to a voter must interface with VoteWA in compliance with [RCW 29A.08.770](#).

Partitioning Requirements

In 2025, the Legislature adopted [Engrossed Substitute Senate Bill 5014 \(ES SB 5014\)](#), which established additional security requirements under a new section of [RCW 29A.12](#). Among these is a mandate that each county auditor partition election-related information technology systems and assets from other county infrastructure **by July 1, 2027**. This requirement is intended to reduce the risk of lateral network attacks and enhance monitoring and control of access to critical election systems.

By July 1, 2027, county auditors must partition their election-related information technology systems and assets from the broader county network. This requirement may be met through either:

- Physical partitioning, which involves fully separating the election office's IT infrastructure from the county's enterprise systems, or
- Logical partitioning, which applies network-level restrictions (e.g. firewall rules) that isolate election systems from other county assets while still operating on shared infrastructure.

For guidance on how to implement this logical and/or physical separation, please reach out to the OSOS Information Security and Response Division at cybersecurity@sos.wa.gov.