

Executive Order 14248: Action by the U.S. Election Assistance Commission on Voting System Testing and Certification Provisions

Updated September 18, 2025

President Donald Trump issued an executive order on March 25, 2025, [Executive Order \(E.O.\) 14248](#), that addresses [federal guidelines, testing, and certification for voting systems](#), among other topics. The agency that oversees that work, the [U.S. Election Assistance Commission \(EAC\)](#), has taken some action related to those provisions of the order.

This Insight offers an overview of the federal voting system testing and certification program, corresponding provisions of the E.O., and action related to those provisions by the EAC. It does not address [pending litigation](#) related to the E.O. or otherwise provide legal analysis.

Background

The federal voting system testing and certification program was designed as a service to the states, to help set [baseline guidelines](#) for voting systems and provide for [testing and certification](#) to the guidelines. Use of voting systems that conform to the EAC's [Voluntary Voting System Guidelines \(VVSG\)](#) is voluntary under federal law, although some states [have made](#) some or all of the federal testing and certification program mandatory under their own state laws.

The [processes](#) for adopting and updating the VVSG—which are specified in the [Help America Vote Act of 2002 \(HAVA\)](#)—start with development of draft guidelines, informed by recommendations from an EAC advisory board known as the [Technical Guidelines Development Committee \(TGDC\)](#). The draft guidelines are provided to [two other EAC advisory boards](#) for at least a 90-day review period and to the public for hearing and comment before they go to the agency's commissioners for a vote on adoption. Voting systems are tested to the adopted guidelines by [voting system testing laboratories](#) that are accredited by the EAC, with [assistance](#) from the [National Institute of Standards and Technology \(NIST\)](#).

The most recent version of the guidelines, [VVSG 2.0](#), was adopted by the EAC in 2021 and includes requirements for federal certification in [15 categories](#), such as [Auditable](#); [System Integrity](#); and [Robust, Safe, Usable, and Accessible](#). One voting system [had been certified](#) to VVSG 2.0 as of this writing, and two others [were](#) in the testing process.

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Related Provisions of the E.O.

Two of the provisions of E.O. 14248 related to voting system testing and certification are directed to the EAC. First, Section 4(b)(i) says that the EAC “shall initiate appropriate action to amend the Voluntary Voting System Guidelines 2.0 and issue other appropriate guidance establishing standards for voting systems to protect election integrity,” including to provide that voting systems should

- “provide a voter-verifiable paper record to prevent fraud or mistake,” and
- “not use a ballot in which a vote is contained within a barcode or quick-response [QR] code in the vote counting process except where necessary to accommodate individuals with disabilities.”

Second, Section 4(b)(ii) says that, within 180 days of the order, the agency “shall take appropriate action to review and, if appropriate, re-certify voting systems under the new standards established under [section 4(b)(i)], and to rescind all previous certifications of voting equipment based on prior standards.”

A third voting system testing and certification-related provision is directed to the [U.S. Department of Homeland Security \(DHS\)](#) and its [Federal Emergency Management Agency \(FEMA\)](#). Section 4(d) says that DHS and FEMA shall “heavily prioritize compliance with the Voluntary Voting System Guidelines 2.0 developed by the Election Assistance Commission and completion of testing through the Voting System Test Labs accreditation process” when considering funding for state or local election offices or administrators under the homeland security grant programs in [6 U.S.C. §603 et seq.](#)

Action by the EAC

The EAC [has reported](#) communicating with FEMA about Section 4(d) of E.O. 14248. It has also [started soliciting](#) input from its advisory boards and [engaging](#) in other discussions about Section 4(b)(ii), with a representative of the agency [noting](#) that it views such conversations as “within the [E.O.’s] 180 day window.”

The EAC’s commissioners issued some guidance related to Section 4(b)(i) of the E.O. on May 27, unanimously approving a [policy](#) affirming support for voting systems that “have a paper record of every vote.” The agency has subsequently taken further action, submitting a [draft revision of VVSG 2.0](#) for consideration by the TGDC at its [annual meeting](#) on July 2. The draft, labeled VVSG 2.1, would modify VVSG 2.0 to incorporate [new common data formats](#) from NIST, [information about Requests for Interpretation](#) of VVSG 2.0, and [other feedback](#) on implementation of that version of the guidelines.

The draft revision also proposes [changes in response to E.O. 14248](#), including about

- **Barcodes and QR codes.** The EAC [said](#) at the July 2 meeting that the E.O.’s provision prohibiting use of barcodes or QR codes to encode voter selections except to support accessibility is implicit in VVSG 2.0 because the only systems that can produce such codes are electronic systems that have to meet VVSG accessibility requirements. The draft VVSG 2.1 includes an [explicit statement](#) of that position and [edits to related guidelines](#) that are presented as reflecting it.
- **Paper records.** The draft VVSG 2.1 [would rephrase](#) some of VVSG 2.0 to reflect the E.O.’s call to require voting systems to provide paper records that voters can verify. It [would also modify](#) VVSG 2.0’s treatment of [end-to-end verifiable \(E2EV\) voting systems](#), which [are](#) systems that use cryptographic techniques to allow for verification that votes were cast as intended, recorded as cast, and tallied as recorded. VVSG 2.0 [requires](#) voting systems to be [software independent](#) to receive federal certification and provides for two paths to software independence: (1) voter-verifiable paper records, and (2) E2EV systems. That requirement has functioned as a requirement for voter-verifiable

- paper records in practice because there [are](#) no E2EV voting systems currently on the market and no EAC protocols for E2EV systems [are](#) available now or expected to be available in the near future. The draft VVSG 2.1 would make it a requirement in principle as well, by [requiring](#) E2EV systems to produce voter-verifiable paper records.

The TGDC opted to defer voting on making a recommendation about the proposed VVSG 2.1 in its July 2 meeting, pending further discussions of the draft. The EAC scheduled working sessions on [July 30](#), [August 8](#), and [September 17](#) to hold those discussions. A revised version of the proposed VVSG 2.1 was discussed in the September 17 working session but had not yet been released publicly as of this writing.

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