National Institute of Standards and Technology
National Voluntary Laboratory Accreditation Program (NVLAP)

SIGNATURE SHEET

Laboratory Name: InfoGard Laboratories, Inc.

Field(s) of Accreditation: Voting System Testing

NVLAP Assessor(s):

Name	*Signature*
Daniel D. Hoolihan	_____
Steve Freeman	_____
_____	_____

On-Site Assessment Dates: 26 February 2007 - 1 March 2007

Type of Assessment (check one): ☒ Initial ☐ Renewal ☐ Monitoring ☐ Other

Note: Please list laboratory personnel present at exit briefing on the back of this page.

Instructions for the Laboratory

Respond in writing within 30 days of the date of this report, addressing all nonconformities documented by the assessor(s). All nonconformities must be satisfactorily resolved before accreditation may be granted. See page 2 for guidance and instructions on responding to nonconformities.

The On-Site Assessment Report, the information supplied by you, and the results of any required proficiency testing will be reviewed by NVLAP with the assistance of technical experts as necessary. NVLAP is solely responsible for the content of this report and reserves the right to change the findings of the assessor(s), based on the results of this review. The final evaluation of your laboratory, for the purpose of deciding whether to approve or deny an initial or a renewal accreditation, will be conducted by NVLAP. It is the responsibility of the Authorized Representative to understand and respond with sufficient information within the required timeframe. Failure to respond may result in the suspension of your laboratory's accreditation or, in the case of a new laboratory, may delay an accreditation decision. Questions concerning this response should be directed to NVLAP.

Send your response to:
NVLAP
National Institute of Standards and Technology
100 Bureau Drive, Stop 2140
Gaithersburg, MD 20899-2140

Signed Statement

The assessor has discussed the contents of this report with members of the laboratory management who agree to respond in writing to NVLAP, regarding resolution or correction of any nonconformities noted, within 30 days of the date of this report.

Signature of Authorized Representative or designee: _____

Printed Name: Tom Caddy

Guidance and Instructions on Laboratory Responses

Resolving nonconformities: A laboratory's response shall include documentation that the specified nonconformities have been corrected and/or a plan of corrective actions. A corrective action plan must include a list of actions, target completion dates, and names of persons responsible for discharging those actions. All nonconformities must be satisfactorily resolved before accreditation may be granted. For accredited laboratories, this is interpreted to mean that nonconformities adversely affecting the outcome of calibrations or tests must be addressed and corrected immediately (within the 30 days). Evidence must be supplied which clearly demonstrates that actions taken fully resolve the nonconformities, thereby removing any concern as to the quality of results of the calibrations or tests conducted by the laboratory. In those cases where specified nonconformities do not directly affect the results of calibrations or tests, such as those related to record-keeping, NVLAP may accept a plan and a schedule, as previously described, as satisfactory resolution. When this occurs, laboratories are expected to submit sufficient objective evidence demonstrating that the nonconformities have, in fact, been resolved according to the schedule. All responses must be sent directly to the NVLAP office, not to the assessor(s).

Referencing nonconformities: Each nonconformity must be referenced in your response by item number as it is listed in the appropriate checklist. Cite the requirement against which the nonconformity is stated and, where more than one nonconformity was recorded against the same requirement, either restate the specific nonconformity, or indicate to which test/parameter the response is related.

Objective evidence: The laboratory may ask for clarification of a nonconformity either during the closing meeting or from the appropriate NVLAP Program Manager. It is required that objective evidence be submitted as proof that a nonconformity has been effectively resolved. Such evidence includes updated procedures, uncertainty analyses (where appropriate), corrected/updated sections of the quality documents associated with a stated nonconformity, copies of completed records, corrective action reports, etc. NVLAP reviews all responses, with the assistance of appropriate technical experts as necessary, and is solely responsible for the final decision regarding the resolution of a nonconformity and for the granting of initial or renewal accreditation.

ON-SITE ASSESSMENT NARRATIVE SUMMARY

CHANGES TO CURRENT OR REQUESTED SCOPE OF ACCREDITATION
(Additions, Deletions, Modifications)

4.1 ORGANIZATION

InfoGard Laboratories, Inc (InfoGard) is a corporation that specializes in testing. It provides various independent trusted third-party security assurance services for client firms.

The organization is outlined in QA 100, Quality System, which includes an organizational chart.

4.2 MANAGEMENT SYSTEM

InfoGard has an extensive Quality Manual that explains in detail their Management System. High-level managers ensure the integrity of the Management System is maintained before approving any changes.l

The Management System includes Policies, Procedures, Forms, Instructions, and Desk Procedures.

4.3 DOCUMENT CONTROL

Quality Document Control is covered in QA 202 - Procedure for Quality Document Control.

The procedure describes the steps for numbering and controlling revisions of project documentation created by InfoGard.

The documentation is well controlled and well-written.

4.4 REVIEW OF REQUESTS, TENDERS AND CONTRACTS

Contract Review is covered in the procedure QA 1001 entitled Contract Review. This is a new procedure for the company and is dated February 21, 2007.

It applies to all services contracted to InfoGard. It includes Service Agreements, Quotations signed by the customers, Purchase Orders with signed Quotation, Service Contracts, and other Contract Vehicles as negotiated with the customer.

4.5 SUBCONTRACTING OF TESTS AND CALIBRATIONS

The Subcontracting procedure is QA1002 and is a new Procedure which is dated 21 February 2007.

The :QA 1002 Procedure applies to all services subcontracted by InfoGard where. subcontracting is defined as contracting to another entity the responsibility of performing services on InfoGard's behalf.

4.6 PURCHASING SERVICES AND SUPPLIES

Purchasing is covered by QA 801 a Procedure entitled "purchasing." It is a new procedure having a first-release date of 20 February 2007. It defines the InfoGard procedure for the purchase of materials.

Materials include capital equipment, office supplies, software, computer equipment, materials and equipment used for testing and evaluation, and other items purchased for use by InfoGard.

4.7 SERVICE TO THE CUSTOMER

Covered under QA 600, Test and Evaluation.

In the QA 600 :Procedure, the Project Manager has responsibility for ensuring that the test or evaluation is carried out as agreed with the customer and in accordance with InfoGard policies and procedures.

4.8 COMPLAINTS

Complaints are handled by the InfoGard Procedure, QA 206.

Complaints may be received from employees, customers, or government agencies.

Serious complaints are resolved at the highest levels of management and the record of these complaint resolutions was received and found to be excellent.

4.9 CONTROL OF NONCONFORMING TESTING AND/OR CALIBRATION WORK

Non-Conforming Test or Evaluation Work is covered by paragraph 4.10 of Procedure QA 600.

It assigns appropriate responsibilities to Program Managers and the Quality Manager for taking actions resulting from Non-Conforming work.

4.10 IMPROVEMENT

Quality Commitment is covered in paragraph 4.2 of QA 100, the policy on Quality Systems.

InfoGard Laboratories is committed to Total Quality Management and has established a system of controls and feedback to CONTINUOUSLY improve quality.

4.11 CORRECTIVE ACTION

Corrective Action Plans (CAP)are covered in QA 203.

QA 203 includes a CAP Form, an Instruction for CAPs, and a CAP Log.

4.12 PREVENTIVE ACTION

Preventive Action is covered in the Policy on Quality Assurance, QA 200.

The paragraph of interest is 4.8 and states that “preventive action shall be implemented to identify opportunities for improvement in processes.”

Preventive actions could include analysis of data, trends in employee feedback, post project reviews, and other information that might indicate a trend or risk that might lead to non-conformance or an opportunity to improve a process.

4.13 CONTROL OF RECORDS

Change Control is covered in the Quality Assurance Policy, QA 200, in Paragraph 4.7.

That paragraph states that “all policies, procedures, and instructions that make up the Quality System shall be under change control by Quality Assurance.”

4.14 INTERNAL AUDITS

Internal audits are handled by QA 201 which was recently revised.

QA 201 includes two appendices; one for an Internal Audit Report and one for an Internal Audit Log.

4.15 MANAGEMENT REVIEWS

Management Quality Reviews are covered by QA 208 which was recently revised (Revision F - 19 February 2007). QA 208 includes a succinct Management Review Report Form.

The latest Management Reviews were surveyed and found to be acceptable.

5.1 GENERAL

InfoGard has a number of engineers who specialize in software and system testing and evaluation.

5.2 PERSONNEL

Infogard has experienced and trained personnel for the duties they are involved with.

They have an extensive screening process for hiring employees and they have a thorough training process for new employees to integrate them into the company.

5.3 ACCOMMODATION AND ENVIRONMENTAL CONDITIONS

The company is primarily located in two buildings in downtown San Luis Obispo. The accommodations are modern, clean, environmentally controlled, and have excellent security considerations.

A power-point presentation was given by the management of the company to the assessors on the company and its accommodations including the security safeguards in the accommodations. A novel key concept was one of the highlights of the PP presentation.

5.4 TEST AND CALIBRATION METHODS AND METHOD VALIDATION

Reviewed samples of test methods for Technical Data Package Review, Source Code Review, Usability and Accessibility, Accuracy, and Reliability and others. Most were examined with a discussion of the TM documentation or walk-through the procedure since no voting system or prototype is available to demonstrate or show a record of the process.

(X) Many of the methods have been adopted from the Common Criteria program and are being adapted for use in this testing and review (the use with modification of a recognized standard methodologies). In several of the test methods, such as 2.2.5 Flaw Remediation and 2.2.12 High-level design, the wording is still in terms of the Common Criteria security requirements and needs to be updated as needed to reflect the application to the voting systems testing requirements.
(X) Several methods, such as the Usability test method involving verification of HAVA 301 functional requirements for responding to voter under- or over-voting, do not provide directions for the procedure including test tools (for example, test election criteria and design), setup conditions, and other factors required under HB 150 in items 5.1.1, 5.4.1, and the note following 5.4.4.
(X) Source Code Review included a manual demonstration of what they expected to do. The test method provides a good proposal for validation for both manual and automated review but the control code sets have not been developed yet, tools have not been validated, and records of method validation are not available. Other TMs require similar development in procedures, preparing equipment for test, and method validation

5.5 EQUIPMENT

Thie equipment of the company consists primarily of computers and servers which are used in the testing and evaluation of customers' products.

5.6 MEASUREMENT TRACEABILITY

This topic is covered in QA 700, Measurement Traceability.and Calibration.

It applies to all hardware or software tools, gauges, and instruments used for testing, evaluation, or inspection of customer products.

5.7 SAMPLING

Covered in Paragraph 4.6 of QA 600, the Test and Evaluation Policy.

5.8 HANDLING OF TEST AND CALIBRATION ITEMS

Paragraph 4.5 of QA 600, Test and Evaluation, covers this element. It says “test and evaluation personnel shall protect products and systems under test and calibrated tools from modification, unauthorized access, and use. “

It also says “Test and evaluation personnel shall also maintain separation between and control over the items from different tests, to include the product being tested, its platform, peripherals, and all documentation.”

5.9 ASSURING THE QUALITY OF TEST AND CALIBRATION RESULTS

QA 700 - Measurement Traceability and Calibration is appropriate.

5.10 REPORTING THE RESULTS

(X) Items that needed to be added to the report document:
1. location where the tests were carried out if different than the laboratory address.
2. “and a clear identification of the end of the report.” InfoGard proposed to include “n page of m” item to each page.
3. authorization of the test report is not included.
4. the required statement to the effect that the results relate only the items tested or calibrated. Needs to be added.

ANNEX A.
REFERENCING NVLAP ACCREDITATION

QA 101, Procedure for Use of the NVLAP Term and Logo.

ANNEX B.
IMPLEMENTATION OF TRACEABILITY POLICY IN ACCREDITED LABORATORIES

QA 700, Measurement Traceability and Calibration is appropriate.