



Impartiality Policy

U.S. Alliance For Election Excellence Certifying Body

1. Policy Statement. The U.S. Alliance for Election Excellence Certifying Body (the "**Certifying Body**"), a defined part of Center for Technology and Civic Life, understands the importance of remaining impartial and independent in providing certification services for local election offices. Commercial, financial, or other pressures shall never be allowed to compromise impartiality. This impartiality policy guides all of the Certifying Body's processes, procedures, and policies. In addition to operating independently, the Certifying Body has taken measures to continually monitor and reinforce impartiality. The Certifying Body uses impartiality risk analysis to identify, analyze, and document any potential threats to impartiality and objectivity. The Impartiality and Appeals Committee also reviews all activities, policies, practices, and relationships at least once a year. Both practices allow us to actively assess and prevent any potential threats to impartiality. Ultimately, the Certifying Body is committed to ensuring impartiality at every step in the certification process in order to promote fair, unbiased assessments.
2. The Certifying Body's policies and procedures shall be nondiscriminatory and administered in a nondiscriminatory manner. Subject to limitations in this document, the Certifying Body shall make its verification and validation services available to all local election offices whose application for certification meets the Certifying Body's publicly available criteria for certification. Certification shall not be conditional upon membership of any association or group, geographic location, party affiliation, or familiarity. Certification services may be restricted without discrimination where there is an unacceptable risk to the Certifying Body. Such risks include but are not limited to evidence of fraudulent behavior, concealment of information, or providing false information in an application or in a certification process.

3. All personnel, contractors, and volunteers of the Certifying Body involved in the delivery of certification services:
 - a. Shall act objectively and be free from any undue commercial, financial or other pressures that could compromise impartiality, and
 - b. Are under a continual obligation to disclose potential conflicts of interest.
4. The Certifying Body shall monitor its activities and relationships to identify threats to its impartiality, which shall include the relationships of its personnel and familiarity with its clients. If a threat to impartiality is identified, the Certifying Body shall take action to eliminate or minimize the threat so that impartiality is not compromised. The Certifying Body shall also take prompt action to respond to any threats to its impartiality arising from the actions of other persons, bodies, or organizations.
5. The Certifying Body shall not offer or provide any service that impacts its ability to maintain impartiality. The Certifying Body does not provide consultancy, conformity assessment services, or any other services that pose a risk to impartiality. The Certifying Body shall not suggest that certification would be simpler, easier, faster, or less expensive if any specified person or consultancy was used or otherwise market or link its activities with the activities of any entity that provides consultancy services.
6. Certification decisions shall be made by persons other than those who conducted the assessment or review. Internal Auditors shall never audit their own work. Reviewers of complaints or appeals shall never review complaints or appeals with respect to their own work.
7. The Certifying Body monitors conformance to this Impartiality Policy through administration of its management system, including its process for managing risks.