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July 15, 2021

National Institute of Standards and Technology  
100 Bureau Drive,  
Mail Stop 8970  
Gaithersburg, MD 20899-8970  
VIA ELECTRONIC SUBMISSION

Re: "Promoting Access To Voting" - NIST-2021-0003

Dear Sir/Madam:

Georgia ADAPT submit these comments in response to the National Institute of Standards and Technology's ("NIST") request for information, dated June 16, 2021, (referred to herein as "RIF") on "Promoting Access to Voting", also known as NIST-2021-0003.

Georgia ADAPT is grassroots driven advocacy organization to promote equal access to ADA, ACA, Medicaid, and voting rights in GA. Also, we want to eliminate discrimination for people with all kinds of disabilities, including ending the Institutional bias in multimodal places. GA ADAPT covers the entire state of Georgia and been here at least since 85.

We have responded to the RIF and our responses:

**Question Number 1: Describe concerns regarding accessing the right to vote privately and independently for people with disabilities.**

**Response to Question Number 1:**

People with disabilities have, and continue, to experience difficulties with exercising their right to vote privately and independently. It has been only within the last few years that polling sites have been made more accessible to voters with disabilities and voters with disabilities have been given the opportunity to privately and

independently read/hear the ballots contents and to mark the ballot and cast their vote privately and independently. Although voting has vastly improved in the past thirty years since the enactment of the Americans With Disabilities Act (“ADA”) and its implementing regulations, there are still many areas in which improvements could be made.

In Georgia, we know the voting machines are not accessible to Blind/ Low Vision; The National Federation of the Blind/ GA NFB worked months with GA ensuring, testing, adapting voting machines and came to agree on one machine that was the only accessible one. However, GA did not pick this despite being told by disability communities, GFB, and other entities. **Thus in GA, one still- even with new machines as of NOV 2020- cannot privately or independently vote.** Other with physical disabilities can't vote independently because of blocked ramps, or steps, or concrete derogation in road, sidewalks, and walkways. Disabled folks are afraid their chair may fail or need advanced navigation (see ahead the pathways IF they can be accessed). Many point places are poorly marked, other areas are inaccessible, and often dangerous to maneuver alone.

Likewise, Randolph Co. GA attempted to use the ADA violations to suppress BIPOC Elderly and disabled. Only thru public outcry did the 8+ polls not close. ***Yet have those 8 polling places been made accessible? No. We cannot find a record of such repairs or alterations to make them reasonable.*** Thus, disabled folks are still at risks of falls, failure to get in (ramp often have trash piled on them in Jan runoff) and signage does not alter folks who are Blind/ Low vision. Disabled spots are blocked by or held by post officer carriers, AMAZON, UPS, or FedEx. So, Georgia has continued to fail disabled. Leaving us waiting 5 hours to vote in a runoff area that's primarily BIPOC and working class; yet primarily white suburban polls have little to no wait time. This is both unacceptable, racist, and ableist. How can we vote now, when Georgia's changed its own law after that issue for the worse, and not fixing any of our complaints?

This “paper ballot mandate” set forth in the proposed "For the People Act". Specifically, as presently written, the proposed legislation would prevent innovation in election technology which would bar accessibility gains in the future and silence the voice of millions of American voters who are disabled, including, but not limited to, voters who are amputees, blind, visually impaired, paralyzed, dyslexic, as well as many Americans who speak English as a second language.

It is well known that access to equal transportation services for voters with disabilities has not been completely achieved and that this fight continues since it impacts so many facets of voters with disabilities' lives including traveling to polling sites. **In GA, this ride system -- if it exists --can't wait 5 hours for voters in line. Neither Uber nor Lyft could tell us if they had 1 or 10000 accessible vans: proprietary knowledge was their response.** 2<sup>nd</sup> attempt resulted in no answer. With the option to electronically receive and return an absentee ballot in the 2020 election, many voters with disabilities who could not visit a polling site were troubled by GA process (must sign your name the same, buy a stamp, use the colored

envelope or be denied a vote – how can one see the colors? Georgians with disabilities cannot vote independently nor privately. Likewise, locally Marta ([itsmart.org](http://itsmart.org)) received vouchers from Uber—yet Uber could ONLY provide rides to NONDISABLED or certain non-physical disabilities. Hence, unnecessary discrimination occurred (separate and unequal access). Meanwhile, disabled folks (physical or those who qualify for mobility supports) had only GA ADAPT or their local van/mobility services. These were incapable of meeting the demand during a runoff campaign in GA!

Significantly, electronic voting at poll sites through Ballot Marking Devices are now just a touch screen thru out the state. I'm not clear we have other ("voting machine/ touch screen/ devices to record one's votes").

If voters with disabilities are forced to use a paper ballot, we will not only be returned to second-class citizen status, but more importantly, many voters with disabilities will be forced to make a Hobson choice to not vote or exercise their right to vote without the privacy and independence enjoyed by other voters.

We agree with Downstate NY ADAPTs comments:

“We strongly recommend that any proposed standards, guidelines or regulations, dealing with voting ensure that voters with disabilities retain their legal right to cast a private and independent ballot through the use of "voting machine/ touch screen/ devices to record one's votes". We also request that the flexibility of using digital access be included in any standards, guidelines or regulations dealing with voting to ensure that voters with disabilities receive full and timely access to voting and the ability to cast their vote. Further, we recommend that any standards, guidelines or regulations dealing with voting include remote, accessible ballot marking systems in the definition of the voting system, since this will bring remote voting systems into the HAVA-mandated requirements for published standards, independent compliance testing by federally accredited test labs, and the national certification of systems deemed compliant with published standards.”

Any such certification must include people with Disabilities at ever level of this decision and testing must and should include a variety of disabilities like: Deaf/ HOH, DeafBlind/ Blind & Low Vision, Physical Access, Neurodivergent folks and in a variety of Apps, machines, and other devices.

**“Nihil de nobis, sine nobis.” “Nothing about us without us.”**

**Further any proposed standards, guidelines or regulations dealing with voting SHOULD NOT limit voters with disabilities to “one accessible machine per polling place”** since such a requirement has resulted in segregated voting for voters with disabilities. Instead, there should be included in any standards, guidelines or regulations concerning voting a requirement that accessible voting systems be sufficient in number to be the primary method of voting for in-person voting. NIST and the United States Access Board should issue proposed standards, guidelines or regulations that include a sufficient number of accessible voting

guidelines or regulations that include a sufficient number of accessible voting systems.

Since many states voting machines as well as other like devices- voting machine/ touch screen/ devices to record one's votes- are at or near the end of their useful lives, states should be directed to purchase new fully accessible voting equipment that provides for in-person voting as well as remote voting by voters with disabilities. Sadly, Georgia bought millions of dollars of equipment they knew was unacceptable and inaccessible. Yet, now GA says they cannot afford any changes- and we are literally stuck with these failed machines for 10 years if not more. Voter suppression is unacceptable, but the dept of ignorance in some states is unforgivable. So of course, funding needs to be provided for such purchases as well as for research and development and pilot projects that could be implemented by elections administrators to ensure that progress is made in implementing better technology as it develops.

**Question Number 2: Describe effective strategies, techniques, and technologies for addressing the barriers faced by voters with disabilities throughout the voting process.**

**Response to Question Number 2:**

Some effective strategies, techniques, and technologies for addressing the barriers faced by voters with disabilities throughout the voting process include, but are not limited to:

1-Improved training of poll workers on how to set up, test, operate and do simple troubleshooting to make simple fixes to voting machine/ touch screen/ devices to record one's votes.

2- Poll workers who are in charge of the voting machine/ touch screen/ devices to record one's votes should be the same from year to year. This would lead them to learning how to manage many problems and thus, have the experience to quickly solve the many issues they encounter during each election. With such firsthand and historical knowledge, these poll workers would be able to update the site reports as well as amend the site reports which should improve the accessibility at the polling sites.

3- Better communication as to who can use a voting machine/ touch screen/ device to record one's votes how you can mark your vote on a ballot using the voting machine/ touch screen/ devices to record one's votes and the various formats through which you can access the ballot. It would be helpful if there was available a one-page sheet in various accessible formats explaining this information as well as a social media, television, radio and print campaigns providing voters with this information.

4- Have line managers at polling sites that can make sure the line for waiting to vote moves along in an efficient manner and can direct voters with disabilities to a shorter line as well as provide answers to simple questions that voters may ask when they arrive at their polling site,

5-Provide more seating with variety of levels that meet access needs (children, adults, elderly) at poll sites for voters with disabilities to use while waiting to vote;

6-Make sure that software developers of any accessible vote by mail (“AVBM”) systems, online forms, online information, websites and any other online systems providing information to voters are cognizant of the fact that there are over 90 combinations of browsers, screen readers and operating systems that voters use on their personal computers and devices and thus, such ballots, online forms, online information, websites and other online systems must be thoroughly tested to make sure that they meet all the various combination of browsers, screen readers and operating systems before such are placed into use;

7-When an AVBM system is used the Board of Elections, they need to make sure that all ballots for the county have been pre-loaded, tested and are accessible in advance of each election. By having all the ballots pre-loaded and tested in advance of the election, this ensures that both voters and elections staff will not have to worry about waiting for ballots to be remediated or made accessible later;

8-Also when an AVBM system is used, the Board of Elections must be cognizant of the fact that voters with manual dexterity disabilities may use assistive devices such as sip and puff to navigate through their personal devices and computers, therefore before any online system, online form, online information and website is used it should be proven to work with these and other assistive devices; and

9-when new and improved technology and procedures are implemented to give voters greater access to each stage of the voting process, Boards of Elections need to promote and communicate this information in more than one accessible format so that this important information reaches voters with disabilities who would directly benefit from such changes.

**Question Number 3: Describe barriers that people with disabilities encounter in getting useful information about the voting process.**

**Response to Question Number 3:**

The greatest barrier would be communication: ASL for Deaf CART/ Captions for hard of hearing, plain language for intellectual / developmental disabilities- all these also help foster effective communication to ESL: English as a Second Language, folks with limited literacy, and more.

Specifically, the lack of providing the vast majority of information in formats other than print and English. With the use of computer technology and the availability of screen readers and closed captioning on computers this issue has declined but has not been eliminated. Many voters with disabilities do not have free or very cheap access to the internet as well as screen readers and AI that can convert verbal communications to reliable closed captioning. Thus, these voters are left out of the various stages of the voting process from registering to vote all the way to voting.

The communication needs of voters with disabilities who have English as a second language must be addressed so that they will have access to information about all

aspects of the voting process. Too many times this voter population is overlooked. More information explaining what a voting machine/ touch screen/ devices to record one's votes") works, how it responds/ reacts to request paper and if accessible electronic absentee ballots are available, how to register to vote, who is running for office, what is on the ballot as well as what are their rights as voters and how they can make complaints needs to be provided in various accessible formats in languages other than English.

Further, voters with disabilities in institutional settings such as homeless shelters, nursing homes, assistive living homes, group homes and hospitals are outright denied access to information about the voting process as well as their right to vote. **So too, many voters with disabilities who are incarcerated in these institutions when provided with the opportunity to vote are nevertheless denied their right to vote independently and privately.**

Another barrier is a lack of accessible, affordable, safe, on demand transportation polling sites. Further, for those voters with disabilities who lack access to smart phones, computers and tablets as well as internet service or have unreliable internet service, due to a myriad of reasons, to take actions such as registering to vote and requesting an accessible absentee ballot, it is difficult to access information other than in print, which can exclude these voters with disabilities. In GA, neither Uber nor Lyft had enough vans to meet such need. (See #1) We, GA ADAPT, a nonprofit spent thousands finding vans, drivers, and ensuring 500+ folks in rural areas got rides to polls AND access. Why can't we figure a better way? We did not have money to do such, but voting is a priority and we made it happen. Why can't the state?

**Question Number 4: Describe barriers that people with disabilities encounter with ballots, and in getting useful information about the items on the ballot.**

**Response to Question Number 4:**

When information is sent to voters by candidates it usually is not provided in any other format than print. People with low vision and who are blind, as well as people with learning disabilities cannot access printed information. Most candidates do not caption (in GA) nor use ASL or plain language. Thus, candidates are inaccessible while polling places are jammed with problems. Thus, disabled folks are triple or quadrupled denied/ segregated/ discriminated:

--- So, one can't get accessible info on candidates:

then voting info isn't accessible;

then route or transport isn't available or nonexistent;

then the polls aren't accessible;

then the machine to vote on are accessible ( NFB and Ga Fed of Blind proposed an accessible voting machine which GA did not pick);

then the touch screen voting prints out ( not in extra size but one type) so one cannot read the print out;

then one must take that paper ballot across the room;

then insert into a machine ( with no braille, no instructions, and a person puts it in

then insert into a machine ( with no braille, no instructions, and a person puts it in for you to hurry it along;  
then the machine accepts or denies it ( whole another issues);  
then you are instructed to put the ballot into a trash can like bin- with a paper stuck to it saying: ballots.  
So privacy, independence, and right to access all are multiply DENIED( as of last Runoff in GA). So this all guaranteeing limiting voter access and the right to vote.

Further, at private and public debates and other functions at which candidates may appear, many times the sponsors fail to provide closed captioning, American Sign Language (“ASL”) interpreters and audio descriptions for people with disabilities.

In GA during the Primaries, GDVP: Georgia Disability Voter Partnership of nonprofit, nonpartisan guide, not only in a paper format, large print and braille, but also online with closed captioning, audio descriptions, and an ASL interpreter.

But Georgia has 159 counties, does every county have ballots are provided online they must be screen readable? No. I dare say 75% do not comply with HAVA, ADA, or state accessible laws.

**Question Number 5: Provide recommendations for improving voter access for people with disabilities.**

**Response to Question Number 5:**

- A. The name, telephone number and email address of the ADA Coordinator for the state’s Board of Elections and each county’s Board of Elections office needs to be posted on the state’s Board of Elections’ website as well as on any website of the local city or county Board of Elections. This MUST be accessible in ASL, enlarging it, and also be accountable. Georgia claims it’s each counties responsibility but no or limited funding is available. For example, Grady Co. near Florida boarder, has the Lower Muscogee Tribe – do they receive accessible voter info? No. ASL or large print. No. The point is small counties lack funding but yet the larger ones blame someone else ( The State) for lack of access. For that moment, The State proclaims, “ state rights, counties decide for themselves”.
- B. Here, we are assuming that there is such an ADA Coordinator designated in the state’s Board of Elections’ office as well as in each city’s and county’s Board of Elections office and that their websites are accessible. *If this assumption is incorrect*, we strongly recommend that such a position be established at every state’s, city’s and county’s Board of Elections office in the United States of America.
- C. The poll worker who is in charge of the “ voting machine et al” should be the same from year to year and/or there should be more thorough training of poll workers on the use and basic troubleshooting of such machines, touch screens or other devices relating to voting. This would lead them to learning how to handle many problems and thus, have the experience to quickly solve the many issues they encounter during each election. With such hands-

on and historical knowledge, these poll workers would be able to update the site reports as well as make changes to the site reports which should improve the accessibility at the polling sites.

D. We need better communication as to who can use a voting machine/ like touch screen devices et al. How you can mark your vote on a ballot using the device(s) and the various formats through which you can access the ballot. It would be helpful if there was available a one-page sheet in various accessible formats explaining this information as well as a social media, television, radio and print campaigns providing voters with this information.

E. One or more designated poll workers should be charged with managing the line on which voters wait to vote. Additionally, such designated poll workers should be able to answer many simple questions regarding ways to vote. For instance, the many ways a voter can use the voting machine/ touch screen other devices: how to make a ballot larger, audible, available in several languages and the fact that you can mark the ballot without a pen or even the use of your hands. It would be helpful if there was seating interspersed on both the shorter and longer lines during elections where lines do develop so that voters will have a place to sit at various points along the lines.

F. We need improved disability etiquette training for poll workers.

G. We **need more early voting poll sites**, available on **more days and for longer hours** and they all need to be accessible as well as safe and easy to get to. More specifically, we need more early voting poll sites since people are more reluctant to go to early voting poll sites when they have to use public transportation, which includes Mobility Vans/ Ride, to reach their early voting poll sites. With respect to safety, the path of travel, such as the sidewalk immediately adjacent to the early voting sites and Election Day polling sites as well as parking lots and bus stops near the sites need to be smooth and properly paved with properly installed curb ramps and not have the paths of travel filled with cracks and potholes which can make it hazardous to walk and wheel to the front door of the polling site. Significantly, any accessible website that lists where an accessible entrance for a polling site is located should mention the safest entrance and exit for the polling site as well as where the nearest bus stops and accessible parking are located. Further, the website should show a sample ballot. At a minimum, all the information provided on the accessible website should be shown in those languages that the ballot is required to be provided in. However, it would be better if such information was provided for several additional languages.

H. Ballot Marking Devices/touch screens/ alternative devices need to be set up in spots that are truly accessible. These need to be placed in a location where it is quiet enough for the voters to easily hear the audio instructions as well as in a place where sufficient lighting exists for the voter to see the information provided on the machine, touch screen, or audio reporter. So too, these machines / headsets/ devices need to have better noise cancelling headphones through which a person can hear the instructions.

I. Better signage that would identify how many machines/ touch screens/ voting devices are available at the polling site as well as where the accessible ones are located at the polling site needs to be provided at both

accessible ones are located at the polling site needs to be provided at both early voting polling sites and polling sites used on Election Day. Further, providing this information concerning these facts on an accessible website that displays the information in a clear and simple manner would be very helpful to voters with disabilities.

J. When these devices/ equipment/voting machines and scanners are not contained in one voting machine, the two machines **should be located near each** other so that voters can easily access the scanner after they mark their ballots. In Georgia, our poll had 50 feet to travel before they could place their supposedly private, secure vote into a fax like machine. The poll worker stands there- no help to disabled. The poll person looks at your vote, and asks you to insert the ballot a certain way. Of course, the privacy of a voter was compromised in GA when placing the scanner near each other. We must do better.

K. When the voting devices/ machines and scanners are not contained in one voting machine, poll workers should be located near (but not so close as to compromise a voter's privacy rights) to assist voters who request assistance with moving from the scanner to insert the completed ballot into the scanner. Further, scanners need to be accessible so that a voter with a disability can easily cast their vote. In Georgia, this is untrue at least in my experience.

L. **People with disabilities need to be made aware of the fact that they can request reasonable accommodations when they apply for a poll worker position.** In addition to people who are blind or have low vision, there are people with disabilities that have difficulty completing a written test. Thus, we request that the option to go through the same training that people who are blind or have low vision be available to people with other types of disabilities, such as, but not limited to, people with cognitive disabilities.

M. The voter registration tablets should have accessible technology so that people with low vision or who are blind can know what it says as well as be able to navigate the controls. Further, these tablets need to provide more than one way that a person can sign-in on the tablet. This would bring about greater access for both voters and poll workers with visual and manual dexterity disabilities.

N. Another recommendation that could be implemented after the coronavirus pandemic is over is making independent living centers ([ncil.org](https://www.ncil.org) non-institutional self-advocacy-based centers unrelated to assistive living or other like housing) polling sites.

O. The writing on the ballot needs to be larger for all voters and the ballot needs to be designed to be easier to read and understand so that voting becomes an easier experience to many more voters. Of course, the format, size and appearance of the ballot must be the same whether it is marked manually, electronically, with voting device, touch screen or like devices, or through the mail, that is, through the use of an absentee ballot.

P. With respect to when Ranked Choice Voting ("RCV") such as in NYC is available to voters, first, there needs to be uniformity in how candidates are displayed. More specifically, a voter should be given the opportunity to mark their ballot on a voting device/ touch screen or such equipment completely

for one office, like what was done for the office of Mayor in the recent primaries in New York City, before being asked to mark their ballot for another office. Second, how the candidates to which RCV is available to voters will be displayed on the voting device /print out/ display needs to be correctly and clearly communicated to the voters using a voting device. By implementing these changes, the process for marking a ballot on a voting device/touch screen like equipment etc. when RCV is used would be much simpler and easier for a voter using approved voting device /touch screen to navigate through the ballot.

Q. With respect to online Voter Guides, it would make it easier to navigate it if you only had to input your address once and not every time you wanted to look at the candidates for a different office. Please limit colors because many folks are color-blind or like me have Tritanopia ( see colors differently) .

R. Most importantly, there needs to be a way to check whether a voting device is working properly early on the morning of the first day of the early elections and on Election Day, such as possibly through the use of a mock or test ballot. It would be even better if such an operational check could be done first thing in the morning every day of early voting as well on Election Day so that problems would be identified and corrected before voters need to use the to mark their ballots/ use voting devices. Test EACH device: in GA that would be the computer/ touch screen and audio; the printer for ballot; check ballot itself; check ballot as its processed at the fax like machine ( scanner) and ensure no blockages in the trash can like bin marked Ballots.

S. In respect to the accessible electronic absentee ballot, presently, many voters with disabilities do not have access to a printer to print out the marked ballot or the capability to place the marked ballot into the oath affirmation envelope and return envelope. The best solution would be for all voters to be able to securely mark their ballot online as well as vote online through a secure portal.

T. When running for an office, many times candidates have to get petitions signed in person which can be difficult for voters with disabilities to be able to run for office. Thus, candidates should be permitted to get petitions signed online or eliminate this requirement completely.

U. Candidates with a disability should be permitted to use campaign funds to cover campaign-related expenses incurred such as an assistant to take notes for a candidate with a manual dexterity disability, provide assistance getting to events, provide visual descriptions of places and people, ASL interpreters, etc. so that candidates with disabilities are placed on a level playing field with other candidates (See, NY campaign funds have been allowed to be used to cover campaign-related child care expenses on the federal level and in NYC, see Campaign Finance Board Handbook p. 28, link annexed

[http://www.nyccfb.info/PDF/candidate\\_services/Handbook\\_2021.pdf](http://www.nyccfb.info/PDF/candidate_services/Handbook_2021.pdf)).

V. Georgia rarely reports use of curbside voting. Please address curbside voting as an additional access for disabled.

W. We need national standards that allow Poll Workers to assist disabled such as a glass of water or assistance in other ways. GA SB 202 have

to be added more opportunities for reasonable accommodations from friends

anded may opportunities for reasonable accommodation from friends, personal attendants, and others such as poll work or supervisors who could make this process more welcoming.

**Question Number 6: Identify what has had the most impact enabling people with disabilities to vote privately and independently.**

**Response to Question Number 6:**

One of the greatest innovations has been the creation of the voting device which allows a voter to see and/or hear what is contained on a ballot and provides several different ways for a voter to mark their ballot. We believe that in addition to voting devices/touch screens, the Americans With Disabilities Act requirements that polling sites and voting machines be accessible has had the most impact enabling people with disabilities to vote privately and independently.

However, many of our members have encountered problems using the voting machine or device located at their polling sites because they are not set up properly and tested at the polling site before the voting starts during the early voting period in Georgia Election Day and runoff. This needs to be rectified.

Another great innovation is the partially accessible electronic absentee ballot which sends an email containing the ballot to a voter. After the voter receives the ballot, the voter can mark the ballot on their computer or smartphone and then print out and mail back or drop off the ballot themselves or have a person they trust drop off the ballot. Presently, printing the marked ballot as well as placing it in the sealed affirmation oath envelope and in the return envelope can be difficult for voters with disabilities. So too, presently, mailing the completed ballot in the envelopes as well as dropping it off at a polling site can be difficult, and in some instances impossible, for voters with disabilities.

**Question Number 7: Identify gaps that remain in making voting accessible to people with disabilities.**

**Response to Question Number 7:**

First, and most importantly, many times ballot marking devices are not set up properly to provide a voter with a disability the ability to independently and privately mark their ballot. Further, the voter with a disability may not be able to independently locate the scanner, the actual voting machine, to feed their marked ballot privately and independently into the scanner to cast their vote. As previously mentioned, the voting device/screen/ machines/scanners/ printers may get jammed or not work at all and thus, prevent a voter with a disability from being able to "read/hear" the ballot privately and independently as well as prevent a voter with a disability from being able to mark the ballot privately and independently.

Additionally, obstacles can block accessible entrances and exits to polling sites and the paths of travel leading to and from the entrances and exits can lack curb ramps

and be in serious disrepair. Further, websites providing information identifying accessible entrances and exits do not also identify the best accessible entrance or exit. At times, there are not sufficient parking spots available to voters with disabilities near the accessible entrance to a polling site. So too, there is not adequate accessible signage to accessible parking, accessible path of travels and entrances at polling sites as well as to where the voting machines/scanners are located. When “signing in” at the polling site, voters with low vision and who are blind as well as voters who find it difficult to write or cannot write are put in an uncomfortable position to put it mildly. Unlike Georgia’s voting machines etc., NY used the tablets that are presently being used to sign in for voting do not provide for other methods to mark your signature on the tablet. Of course, when a voter with a disability has to sign in on paper, they may face the same issues as raised by the existing sign in tablets in New York City or in GA when signing in.

Please refer to our other responses herein which also discuss the many barriers faced by voters with disabilities

**Question Number 8: Describe barriers that people with disabilities encounter with completing online forms for the voting process.**

**Response to Question Number 8:**

For voters with low vision and who are blind as well as voters with learning disabilities and other cognitive disabilities, online forms can be confusing. Thus, a simple, streamlined form that is also screen readable would assist all voters. The form should be able to be made larger on the screen for people who need larger print to read a form. Additionally, online forms should allow a person to complete the form online and return it online. Of course, a person should also have the option to print out the online form and fill it out manually and either scan it in and submit it online, or mail it, or have it dropped off at an office.

Currently GA own Secretary of State (SOS) web site doesn’t work on mobile phones. The place if dob doesn’t allow 1 plus Phones to navigate the DOB. Since one can’t input dob, you cannot find or verify your status as a voter. This could be easily fixed; it’s been reported to no avail. Often mobile cellular phones may work on dob one time but next they do not. Easily they could have a wrote in drop box in case the calendar or input dates scrolling doesn’t work.

**Question Number 9: Describe barriers that people with disabilities encounter in getting useful information about their eligibility to vote.**

**Response to Question Number 9:**

Much of this was answered above in multiple questions. Communication barriers continue about the voting process, are also applicable here.

**Question Number 10: Describe barriers that people with disabilities encounter with registering to vote.**

## **Response to Question Number 10:**

The same communication barriers identified in our response to question numbered “3”, “8” and others which request information on the barriers that people with disabilities encounter in getting useful information about the voting process, are also applicable here.

Further, voter registration websites are not always completely accessible. Finally, signature requirements as well as government issued identification card requirements many times make it difficult, and, in some instance, impossible for voters with disabilities to register to vote.

## **Question Number 11: Describe barriers that people with disabilities encounter using technology for the registration or voting process, whether online, in person, or via mail.**

### **Response to Question Number 11:**

When using online technology, the barriers can be incompatibility with screen readers, the lack of closed captioning, audio descriptions and ASL interpreters. Additionally, material can be confusing to understand to voters with disabilities and websites may be difficult to navigate and not accessible. Further, if you have to print out forms to complete and send them, voters without printers are disadvantaged. When a voter with a disability has to use mail which may mean exclusively print, as previously stated this can bar many people with disabilities access to information and forms (See our responses herein and more specifically our responses to questions numbered “3”, “4” and “10”).

Again, see issue with SOS website My Voter where the DOB can't be accessed by some apps, programs, or phones but could be resolved with plain text box for date of birth. Currently it still, after 5 years, does not work regularly with my One Plus phone of 5 generations and did not work with Galaxy of 4 gens.

## **Question Number 12: Describe the availability of accessible voting equipment.**

### **Response to Question Number 12:**

Georgia tends to give poorer, more BIPOC areas like precincts *less* numbers of any machines, much less an accessible one. In some instances, the voting machine touch screen/ auditory part is separate from printer, then there is 50 feet to the scanner, independent from the in other instances, the two functions, that is marking a ballot and casting a vote, are in separated: how can one independently and privately vote in Georgia? Voters with disabilities are placed in an untenable position of having to give up their right to vote privately and independently and have someone assist them or not vote at all.

Georgia DeKalb Co kent it separately so that after scanning the paper ballot does

Georgia ballots do not separate, so that after scanning, the paper ballot goes into a trash can type rolling bin as our own bins for trash/ recycle. However, the trash cans aka ballot box bin is marked with a taped piece of paper “ Ballots” or “ Votes”. Often the paper falls off.

Further, in NY state, the voting machine/touch screens/ devices to record one’s votes are aging out and will soon need to be replaced. Yet GA just bought in accessible ones!

We need national guideline, rules, and need greater transparency in the certification of voting machine/touch screens/ devices to record one’s votes, as well as in the process for fair open bidding for the contracts to provide voting machine/touch screens/ devices to record one’s votes and the accessories used with these voting machine/touch screens/ devices to record one’s votes. Georgia already had a sweetheart deal with the company and choice was biased. We know that certification of voting machine/touch screens/ devices to record one’s votes is done by the Board of Elections in each state, however, we believe that there should be greater transparency in these processes for the benefit of all their voters.

Additionally, a cross section of organizations run by people with disabilities as well as organizations representing people with disabilities need to be a part of this certification process from the very start. In sum, processes and procedures need to be implemented to ensure that such are reliable, secure, accessible and allow voters to exercise their right to vote independently and privately.

**Question Number 13: Describe barriers that people with disabilities encounter with voting by mail.**

**Response to Question Number 13:**

The major barrier with voting by mail is that those with low vision or who are blind as well as those with certain cognitive disabilities cannot read a paper ballot. Further, certain voters with disabilities who have difficulty with manual tasks will not be able to fill out a paper ballot. Finally, those voters with disabilities who may be able to both read and complete a paper ballot as well as insert into an envelope and seal it may still have difficulty getting that envelope with the ballot into a mailbox or may be unable to deliver it to a post office or polling site due to a mobility disability. Further, there are still post offices that are not accessible or are difficult for voters with disabilities to enter and access services at, including mailing envelopes.

Where AVBM solution are used ballots must be thoroughly tested to meet all the various combination of browsers, screen readers and operating systems that can be used to mark such ballots (See our answers in response to question numbered “2”).

**Question Number 14: Describe security considerations relevant to existing and potential technologies used by people with disabilities in the voting process.**

**Response to Question Number 14:**

With respect to security of voting, voters with disabilities right to vote privately and independently should not be denied on the purported claim that voting devices are unsecure. It must be remembered that today we do our banking online, pay bills, apply for mortgages, shop and make reservations online as well as enter into contracts on a daily basis over the internet. Today, encryption and other security procedures such as two-step verification can be implemented in the voting process to ensure the security and integrity of our voting system. Finally, as new technologies are discovered the voting process should continuously be updated to incorporate such advances in security to guarantee voters with disabilities their right to independently and privately vote securely.

**Question Number 15: Describe barriers that people with disabilities face at polling locations.**

**Response to Question Number 15:**

The greatest barriers voters with disabilities experience at polling sites is a lack of sufficient training of polling workers on:

- 1-the placing of voting ( machines/ process) in a location that is as flat as possible and as near as possible to the scanner-voting machine while guaranteeing that the voter with a disability can mark the ballot and vote privately and independently,
- 2-communicating with voters with disabilities where everything is located in the polling site, how the devices works and the possibility of seating on the waiting line as well as the availability of a shorter waiting line;
- 3-how to fix simple problems encountered when operating the device(s) (See our responses herein and more specifically our responses to questions numbered "5" and "7").

**Question Number 16: Describe the accessibility of polling places.**

**Response to Question Number 16:**

The location of polling sites is too often a function of limited available space and limited funds in Boards of Elections. First, and foremost, we need more accessible polling sites available with accessible paths of travel, accessible public transportation and accessible parking closer to where people live since many voters with disabilities cannot drive themselves nor can they walk long distances. Such voter with disabilities have to rely on public transportation and paratransit, which is limited and does not provide on demand service to them, or family and friends to get to their "local" polling site.

Second, polling sites must not be placed in buildings that are not completely accessible and have elevators that do not work on the day of the early voting or Election Day. When such obstacles, and clear violations of the law, exist voters with disabilities are prevented from getting to where the voting devices/voting machines are located and from being able to vote privately and independently.

are located and from being able to vote privately and independently.

Third, there needs to be better accessible signage to the accessible parking, accessible public transportation, accessible entrance/exit, the applicable sign-in tables, voting devices/voting machines/scanners.

In summary, not only do we need more accessible polling sites near where voters live, but also, information about such polling sites need to be distributed to the public in several accessible formats. (See our responses herein and more specifically our responses to questions numbered "5" and "7").

**Question Number 17: Identify areas where poll worker training can address barriers experienced by people with disabilities.**

**Response to Question Number 17:**

Turning to better poll worker training, we congratulate the many poll workers who do a wonderful job especially from our organizations' members.

We still need better training for poll workers with respect to their interactions with voters with disabilities as well as with respect to their interactions with their fellow poll workers who are disabled. We need poll workers to understand that voters with disabilities have the civil right to expect and consistently be able to vote independently and privately in a safe and secure environment.

So too, poll workers with disabilities need to be respected. We need more education of poll workers and the public on how voting process/ machines/ devices work, as well as the fact that any voter can use them even if they do not consider themselves to be disabled.

More hands-on training of poll workers on how to set up, operate and trouble shoot small problems with all related devices for voting needs to be done.

The Board of Elections are required by law to comply with the ADA in selecting and setting up polling sites and setting up voting devices/ related items and thus, need to be made more aware of these requirements.

Finally:

- 1-the training of election officials and poll workers needs to better address the civil rights of voters with disabilities as well as poll workers with disabilities,
- 2-the training of election officials and poll workers to provide simple instructions on how to correctly set up the voting devices etc. and check the operation of the such, and fix small problems with voting devices/ items as well as when to contact someone outside the immediate polling site to assist in repairing a machine/device and
- 3-the Board of Elections need to select and set up poll sites that follow the ADA and are safe.

**Question Number 18: Identify areas where clearer or better policies can address barriers experienced by people with disabilities.**

**Response to Question Number 18:**

There are many areas where clearer and better policies can and should address and, in turn, ameliorate or eliminate barriers experienced by people with disabilities. 1-Every Board of Elections or delegated agencies ( such as in GA) needs to have a designated ADA Coordinator whose job is only to deal with making sure that all parts of the voting process are accessible to voters with disabilities. This person's name, title, address, telephone number as well as TDD number and email address should be set forth on the Board of Elections' website as well as in all materials sent to all voters.

2- We support greater transparency in the certification of voting machine/touch screens/ devices to record one's votes, as well as in the process for bidding for the contracts to provide such devices and record one's votes and the accessories used with these. We know that certification of voting machine/touch screens/ devices to record one's votes is done by the board of elections/ or delegation in each state, however, **we believe that there should be greater transparency in these processes for the benefit of all their voters.** Additionally, a cross section of organizations run by people with disabilities as well as organizations representing people with disabilities need to be a part of this certification process from the very start. To conclude, these processes and procedures need to be implemented to ensure that voting machine/touch screens/ devices to record one's votes are dependable, secure, accessible and allow voters to exercise their right to vote independently and privately.

3- Implementing policies that better communicate the fact that any voter can use , as well as how a voter can mark their vote on a ballot using the devices, using the various formats through which you can access the ballot on a such device. This would demystify the VOTING DEVICE and help promote greater use of VOTING MACHINE/TOUCH SCREENS/ DEVICES TO RECORD ONE'S VOTES. It would be helpful if there was available a one-page sheet in various accessible formats explaining this information as well as public service announcements and campaigns on social media, television, radio and print providing voters with this important information.

**Question Number 19: Describe any barriers that people with disabilities face to voting that disproportionately impact communities of color, persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.**

**Response to Question Number 19:**

The lack of reliable, low-cost accessible public transportation in urban and rural areas makes it difficult for voters with disabilities to get to polling sites. Further, the lack of dependable, and in some instances, lack of any internet connections

lack of dependable, and in some instances, lack of any internet connections impacts on voters with disabilities ability to register to vote online, to request an absentee ballot or accessible electronic absentee ballot online, to learn about candidates, and to receive and mark an accessible absentee ballot online. Also, the prohibited high cost to purchase smartphones, computers and tablets as well as the high cost to access the internet can impact voters with disabilities ability to access the internet to participate in the many aspects of the voting process.

**Question Number 20: Of the concerns and barriers noted, identify the most serious and impactful barriers faced by voters with disabilities throughout the voting process.**

**Response to Question Number 20:**

The three greatest concerns and barriers facing voters with disabilities are:

1- access to voting information, including, but not limited to, information on how to register to vote, how to find out about who is running for what office/position and how to mark a ballot and where to vote, that is, where is the voter's polling site, the accessible entrance, the place to sign in and where the voting device/ voting machines are located,

2- accessible on demand transportation to the polling site and proper curb ramps on local streets where one could theoretically walk/wheel to a polling site, and

3-greater access by voters with disabilities to be able to run for office without having to get petitions signed in person and allow candidates with a disability to use campaign funds to cover campaign-related expenses incurred such as an assistant to take notes for a candidate with a manual dexterity disability, provide assistance getting to events, provide visual descriptions of places and people, ASL interpreters, etc. so that candidates with disabilities are placed on a level playing field with other candidates (See, campaign funds have been allowed to be used to cover campaign-related child care expenses on the federal level and in NYC, see Campaign Finance Board Handbook p. 28, link annexed [http://www.nycfb.info/PDF/candidate\\_services/Handbook\\_2021.pdf](http://www.nycfb.info/PDF/candidate_services/Handbook_2021.pdf)).

In sum, it is time that new standards, guidelines and regulations be established so that all Americans with disabilities are guaranteed the opportunity to fully participate in elections on the national, state and local level and the opportunity to equally exercise their right to vote privately, independently, securely and safely.

For barrier-free and institution-free America;

Zan Thornton GA ADAPT & Rev. Butch Brosman GA ADAPT & Lou Paniccioli,  
Youth Organizer GA ADAPT with NYDCO

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