

**Before the
National Institute of Standards and Technology
Gaithersburg, MD 20899**

In the Matter of)
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Promoting Access to Voting) Docket Number: 210608-0123
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**COMMENTS OF
NATIONAL ASSOCIATION OF THE DEAF**

The National Association of the Deaf (the “NAD”) respectfully submits these Comments in response to the National Institute of Standards and Technology’s Request for Information (RFI).

The NAD is the nation’s premier civil rights organization of, by, and for deaf and hard of hearing individuals in the United States. Established in 1880, the NAD was shaped by deaf leaders who believed in the right of the American deaf community to use sign language, to congregate on issues important to them, and to have their interests represented at the national level. Deaf or hard of hearing individuals represent more than 48 million, or one out of every five, Americans over the age of 12, according to the Johns Hopkins University School of Medicine.¹

The NAD applauds the goal behind Executive Order 14019 in promoting access to voting for all citizens, including those who are deaf and hard of hearing. This is an area that has long needed action at the top echelons of government, and the NAD very much appreciates the visibility and attention that the Executive Order and the RFI has brought to this issue.

There are numerous barriers to voting for voters with disabilities including physical and communication barriers as well as voting restrictions that impede their ability to register to vote.

¹ Lin, Frank R., et al., *Hearing Loss Prevalence in the United States*, Arch. Intern. Med. 2011 Nov 14; 171(20): 1851–1852, available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3564588/>.

Specifically for deaf and hard of hearing individuals, there are significant communication barriers such as the lack of communication access at registration locations and voting poll sites. Further, much information released on voting by federal and state entities are not available in American Sign Language (ASL), which is a full-fledged language completely separate from written English. Many deaf and hard of hearing people who are not fluent in English depend on ASL to understand their voting rights. In addition, campaigns by individuals seeking political office are almost never captioned or available in ASL, preventing deaf and hard of hearing people from understanding what their campaign platforms are and what goals they plan to pursue. Debates between political candidates are generally not accessible in ASL either. In addition, referendums are often not explained or provided in ASL format. All of these are issues that present communication barriers to deaf and hard of hearing people.

The NAD is extremely concerned that states may disregard the White House's March 7, 2021 Executive Order. It is our hope that the federal government will develop a concrete plan to enforce the voting rights of people with disabilities given the recent spate of state laws that have made it harder for many people to vote, especially people with disabilities. The Executive Order gives instructions to specific Federal government agencies to take action on making voting more accessible. It is an important start, and much more will be needed on both the federal and state levels to improve voting accessibility for all including deaf and hard of hearing people.

Respectfully submitted,

/s/

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Policy Counsel

National Association of the Deaf