

# PUBLIC SUBMISSION

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RFI: Promoting Access to Voting

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## Submitter Information

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## General Comment

Philadelphia has the highest disability rate of the largest U.S. cities. More than 150,000 Philadelphians speak a language other than English at home. According to the US Census Bureau, between 47,206 and 87,732 Philadelphia citizens of voting age would benefit from expanded language accommodation in just Chinese, Vietnamese, Arabic, Haitian, French, and Russian languages alone.

Since 2015, my organization Chinatown Disability Advocacy Project has primarily supported immigrants with disabilities and families in the Greater Philadelphia area. Our families learn about disability policies and are civically active, participating in town halls, hearings, neighborhood planning meetings, and elections, for examples.

During the COVID-19 pandemic, Asian American and Native Hawaiian Pacific Islanders faced an epidemic of hate and violence that made AANHPI voters hesitant to go to the polls. In 2020 AANHPIs significantly used vote by mail more than any other racial or ethnic group: 73% of Asian American voters cast their ballot by mail in 2020 (TargetSmart).

In Philadelphia, the Philadelphia City Commissioners partnered with grassroots organizations to translate sample ballots into different languages. However, voters were unable to receive absentee mail ballots in languages other than English or Spanish. This made it difficult for them to compare the sample translated ballot with their own ballots, which would often have different candidates' names listed based on their district/precincts.

When we contacted the City Commissioners, they advised that AANHPI voters with disabilities physically visit early vote centers, where staff could arrange for telephonic interpretation. Alternately, these voters could vote on Election Day by utilizing in-person or telephonic interpretation, but the lack of translated absentee ballots exposed our voters with disabilities who needed language access to greater health risks as compared to nondisabled people.

Following the 2020 general election, local immigrant-serving organizations established a coalition Citizens for Language access to petition City Council for funding to support language access. Philadelphia's new \$30 million voting machines can accommodate up to 16 languages. Ensuring language access will also help our voters with disabilities who need language access the ability to cast secret ballots for our public elections.

Voters with disabilities who need language access deserve to have equitable access to the vote. If they choose to vote by absentee ballot, they should be able to obtain ballots in their languages. If they choose to vote in-person using a voting machine, they should be able to cast their ballots in private using the voting machine programmed with their language.

There needs to be funding, support, and technical assistance to ensure that voting machines' translations and translated absentee ballots are accurate and vetted by native speakers. There needs to be funding for voter education and outreach on how to use the accessibility features for these voting machines as well.

Lastly, the community we serve believes that plain language is a crucial and overlooked part of accessibility. Here in Pennsylvania, I have read supposed "plain language versions" of ballot questions that do not look any different from the standard ballot questions, except for maybe less words. It is crucial that actual disabled people be consulted on the quality of the plain language interpretations.

On behalf of Chinatown Disability Advocacy Project families, we urge NIST to strengthen support, increase funding, and acknowledge the intersections of our disability community.

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