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Alicia Chambers, Executive Secretariat  
National Institute of Standards and Technology  
100 Bureau Drive  
Gaithersburg, MD 20899

Re: Public Comments on Draft of Promoting Access to Voting: Recommendations for Addressing Barriers to Private and Independent Voting for People with Disabilities (86 FR 13623)

The American Council of the Blind (ACB) thanks the National Institute of Standards and Technology (NIST) for the opportunity to file public comments on the “Draft Report of Promoting Access to Voting: Recommendations for Addressing Barriers to Private and Independent Voting for People with Disabilities”, as set forth in Executive Order (EO) 14019, “Promoting Access to Voting”.

ACB is a leading national member-driven advocacy group for Americans who are blind and experiencing vision loss. Comprised of more than 65 state and special-interest affiliates, the American Council of the Blind strives to increase the independence, security, equality of opportunity, and to improve quality of life for all people who are blind and have low vision. Fundamental to our mission and our members is equal access to the ability to mark, verify, and cast our private and independent vote, whether doing so in-person at a polling location or by voting remote or absentee. For these reasons, ACB supports the comments filed by the National Disability Rights Network (NDRN).

ACB believes that voters with disabilities must be guaranteed equal access to the ballot box. We advocated for the passage of the Help America Vote Act (HAVA), and our advocacy continues to this day. Throughout the COVID-19 pandemic, ACB, our affiliates, and our members advocated to ensure that the pandemic did not result in an erosion of the hard won rights of voters with disabilities. As many jurisdictions are embracing vote by mail as a method to ease voting access and increase voter participation, we are working to ensure that voters with disabilities are not left behind by the remote voting revolution.

Voting by mail with a paper ballot is inherently inaccessible to ACB members and others who cannot privately and independently handle, read, mark, verify, sign, and return a standard print paper ballot. A common alternative to remote voting with a printed vote by mail paper ballot is to allow voters to receive, mark, verify, and return an accessible electronic ballot. This technology is widely used and trusted to allow uniformed military and overseas voters to exercise their Constitutional right in a timely and secure manner. In 2020, some states authorized the use of this same voting technology available to uniformed and overseas voters to be used by voters with disabilities. For these reasons, we urge NIST to acknowledge that one of the easiest ways to reduce barriers to voting for people with disabilities is to encourage states that allow some voters to receive, mark, verify, and return their ballot using an accessible electronic remote voting technology to make these same technologies available to voters with disabilities who cannot privately and independently complete the voting process using traditional vote by mail with a standard print paper ballot.

ACB thanks NIST for the opportunity to comment on the draft recommendations to improve voting access and remove voting barriers for individuals with disabilities, for both in-person and remote voting. If NIST has any questions regarding these comments, please feel free to contact Clark Rachfal: [crachfal@acb.org](mailto:crachfal@acb.org), (202) 467-5081.

Sincerely,

Clark Rachfal  
Director of Advocacy and Governmental Affairs