

801 18<sup>th</sup> Street NW Washington, DC 20006-3517 (O) 202.872.1300 www.PVA.org

Chartered by the Congress of the United States

November 22, 2021

## **VIA ELECTRONIC SUBMISSION**

National Institute of Standards and Technology 100 Bureau Drive Gaithersburg, MD 20899

RE: Public Comments on Draft Report, "Promoting Access to Voting: Recommendations for Addressing Barriers to Private and Independent Voting for People with Disabilities"

Paralyzed Veterans of America (PVA) appreciates the opportunity to submit comments in response to the National Institute of Standards and Technology's (NIST) request for public comment on the Draft Report, "Promoting Access to Voting: Recommendations for Addressing Barriers to Private and Independent Voting for People with Disabilities Document." The Draft Report was developed using information collected through a June 2021 Request for Information (RFI) in response to NIST responsibilities set forth in Executive Order 14019, Promoting Access to Voting.

PVA is a congressionally chartered veterans service organization founded in 1946 with nearly 16,000 members, all of whom are veterans of the armed forces who have sustained a spinal cord injury or disorder. Virtually all PVA members use wheelchairs or other assistive devices for therapeutic rehabilitation and mobility to ensure access to the mainstream of society. As a result, our members need physical accommodations to access their polling place. For those members who cast absentee ballots or use vote by mail options and have limited hand dexterity or print disabilities, they require accommodations to be able to vote independently as required by the Help America Vote Act.

After reviewing the Draft Report, we believe that the information it lays out represents a good step forward in further defining the obligations required under federal law to ensure local jurisdictions conduct elections in a manner that is accessible for voters with disabilities. We affirm the five systemic barriers to the right to vote that people with disabilities may face as noted on Line 219 based on the experience of PVA members. We also endorse the Draft Report's recommendations on Line 220. PVA believes voting access will improve if jurisdictions fully comply with federal disability laws that govern public accommodations, including polling places. Along with the statutes, guidance manuals or brochures will further help local jurisdictions navigate compliance. To promote accessible accommodations, local jurisdictions should also work with the disability community and provide voter guides that explain accommodations, establish a call line to assist voters with disabilities, or have voter education classes about accessibility for voters and poll workers.

PVA appreciates the opportunity to comment on promoting access to voting for people with disabilities. We would also like to endorse the extensive comments submitted by the National Disability Rights Network (NDRN) on November 19, 2021. If you have any questions, please contact Lee Page, Senior Associate Advocacy Director, at <a href="mailto:leep@pva.org">leep@pva.org</a>.

Sincerely,

Heather L. Ansley, Esq., MSW

Heather J. Andry

Associate Executive Director of Government Relations