



National Coalition on Accessible Voting's Voter Access Guide

Chapter 3: Accessible Voting in Person

A guide for election administrators to making voting accessible for people with disabilities

August 2024

The National Coalition on Accessible Voting is a coalition that maintains and expands voting access for people with disabilities.

About the Voter Access Guide

We wrote the Guide to help election administrators make voting accessible. The Guide provides information, recommendations, and checklists on accessibility for every stage of the voting process, from registering and gathering information on voting to casting a ballot. The Guide identifies barriers to accessibility in advance, allowing you to address them early in your planning process.

We provide links to the best free resources available for each topic. Use the resources provided in the Guide as starting points for further research.

The Guide refers to “expanding” or “improving” accessibility rather than “making voting accessible.” We (and many election officials) strive for full accessibility for all people with disabilities, but full accessibility is an always-moving, evolving target. Polling places may change. Voting equipment may need to be updated. Election administrators and state laws and regulations may change.

Disclaimers

The Guide does not cover every issue. It is a general overview of expanding voting accessibility. We encourage election administrators to do more research on all topics.

This Guide brings voting accessibility resources together in one place for easy access. We link to or cite resources we used to develop the Guide.

Conformance to any recommendations or use of any resources contained within or suggested by this Guide is not intended to act as a standard for compliance with federal or state law.

The recommendations in this Guide do not constitute legal advice or advice on how to comply with any federal or state law or policy, including the Help America Vote Act (HAVA),¹ the Voting Rights Act (VRA),¹ the National Voter Registration Act (NVRA),¹ Section 504 of the Rehabilitation Act of 1973,¹ Section 508 of the Rehabilitation Act of 1973,¹ the Americans with Disabilities Act (ADA),¹ and the Voting Accessibility for the Elderly and Handicapped Act of 1984 (VAEHA).¹

The Guide does not constitute advice on how to implement the President's Executive Order on Promoting Access to Voting (March 7, 2021)¹ or any other Executive Order or policy of any federal agency. Each department, office, agency, organization, entity, or individual must make their own independent determination on compliance with any and all applicable laws, including those discussed in this Guide.

Chapter 3

Accessible Voting in Person

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Many people, including people with disabilities, vote in person. Ways to vote that are “in person” include early voting, curbside voting, voting at the polling place or vote center, and voting at your office.

Every form of voting must be accessible.

For example, you cannot require people with disabilities to vote by mail because your polling places are inaccessible.

Accessible in-person voting requires attentive elections personnel who prioritize people with disabilities’ needs. Common accessibility barriers include physically inaccessible polling places and voting centers, inaccessible voting machines, inaccessible ballots, and poorly trained poll workers and staff.

This Guide section provides election officials with recommendations for improving the accessibility of in-person voting. It also provides you with resources you can consult for more information on in-person voting accessibility.

Early Voting

Acknowledgements: We used the materials on [early voting at USA.gov](#) and the National Conference on State Legislatures' [Early Voting page](#).

Early voting means that voters can cast their ballot before Election Day. As of March 2024, forty-six states, the District of Columbia, Guam, Puerto Rico, and the Virgin Islands allow all voters to vote early and in person¹. Four states do not offer early in-person voting, although some absentee voters (or those voting by mail) might be able to vote early or before Election Day.

All states have different rules for early voting. States have different eligibility requirements, early voting methods, and early voting periods. Some restrict early voting to weekdays and others do not.

Recommendations for early voting

Disclaimer: Following our recommendations is not intended as legal advice and does not necessarily ensure nor is intended as a substitute for full compliance with federal or state law.

- Advocate for changes to your state's laws on early voting to the extent you can. The most accessible early voting is available far in advance of Election Day, which gives voters with disabilities time to learn about it and plan their trip to a polling place, office, or early voting center.
- Give voters more than one way to vote early. Let voters use ballot drop boxes and curbside voting. Ballot drop boxes can help supplement sparse early voting locations. Curbside voting can help some voters with disabilities who find it easier than going inside the early voting location.
- Do not require voters to give your employees or poll workers more documents or stricter proof of identity than they need to vote on Election Day.
- Let voters register at the same time. "[Registering to Vote](#)" has more information on voter registration.
- Make early in-person voting as physically accessible as voting on Election Day. All signs and building modifications, such as accessible parking spaces and entrances, should be present.

¹ Nat'l Conference on State Legislatures, *Early Voting*, <https://www.ncsl.org/elections-and-campaigns/early-in-person-voting> (last updated Mar. 2024)

- Accessible voting machines should be available at polling places and/or early voting centers. **You must have at least one accessible voting machine available at all times to voters, per precinct.**²
- Your employees and poll workers should be trained to assist voters with disabilities during in-person early voting.
- Thoroughly advertise early voting. Social media posts website advertisements, pamphlets, and notices at election offices should describe how to vote early.

² Nat'l Disability Rts. Network, *Accessible Voting Systems Are Required by Federal Law and Are Vital to Our Democracy* (Jun. 29, 2022), <https://www.ndrn.org/resource/accessible-voting-systems-are-required-by-federal-law-and-are-vital-to-our-democracy/>.

Curbside Voting

Acknowledgments: We used the Election Assistance Commission (EAC)'s [quick start guide for curbside voting](#). We also thank Sarah Blahovec for speaking with us on in-person voting accessibility.

Curbside voting should be an option that is available to voters. It is not a replacement for an accessible polling place.

Curbside voting allows voters with disabilities to cast their ballots outside the polling place. In curbside voting, a person with a disability calls an election official or poll worker to their car or to another location nearby.

There must be accessible signs that show voters how to request curbside voting, if it is available. There is usually a curbside voting location. The person with a disability must be able to notify poll workers that they are there and want to use curbside voting.

Once a poll worker is notified, they bring any items necessary for the voter with a disability to mark their ballot privately and independently. This can include an e-pollbook or poll book copy, a ballot, a pen and paper, a notepad, a ballot sleeve or envelope, a portable electronic voting application or device, or other materials. Paper ballots are inaccessible to people with print disabilities; they cannot be the only method available³.

After the voter is finished filling out the ballot and the ballot has been returned, an election official will confirm it for the voter.

The exact specifics of curbside voting are difficult to generalize and differ between states and counties. The Department of Justice's [voting guidance for Title II of the ADA](#) has legal requirements for accessible curbside voting. We recommend that you review it.

The Guide's recommendations help you make curbside voting more accessible and easier to use.

³ Nat'l Disability Rts. Network and Am. Assoc. People with Disabilities, Making Voting Accessible to Voters with Print Disabilities 2 (Jul. 24, 2021), <https://www.aapd.com/wp-content/uploads/2023/06/Making-Voting-Accessible-to-Voters-with-Print-Disabilities-1.pdf>.

Recommendations for curbside voting

Disclaimer: Following our recommendations is not intended as legal advice and does not necessarily ensure nor is intended as a substitute for full compliance with federal or state law, including the ADA.

- Do not assume that a voter needs (or does not need) curbside voting from their disability. During curbside voting, the poll worker should not ask about the voter’s disability.
- Curbside voting should be advertised. Some counties and states in the past had curbside voting, but no flyers or advertisements that told voters about it. Accessible information on curbside voting should be available on the state and county’s website (if the county has a website).
- Poll workers should know their polling place offers curbside voting.
- Poll workers should understand how curbside voting works.
- Poll workers should know how to help voters cast a private and independent ballot legally in the state. Ensure strict chain of custody and privacy rules apply.
- Hire enough poll workers or volunteers to continuously man curbside voting
- Signs that direct voters with disabilities to curbside voting and provide instructions are required by law.⁴ Ensure that the signs are accessible. Create Braille signs if possible. Write your instructions in plain language.
- Poll workers should bring more than one way to mark, verify, and return ballots to the curbside voting location. Poll workers should bring at least one electronic method.
- Poll workers should be prepared to communicate with voters who are , blind voters, low-vision voters, and voters with vision disabilities, voters with psychiatric or mental health disabilities, and voters with intellectual and developmental disabilities and other cognitive disabilities.
- Poll workers should be familiar with augmentative and alternative communication (AAC) devices.

⁴ U.S. Dep’t of Justice Civ. Rts. Div. Disability Rts. Section, The Americans with Disabilities Act and Other Federal Laws Protecting the Rights of Voters with Disabilities, <https://www.ada.gov/resources/protecting-voter-rights/> (last updated Apr. 18, 2024).

Accessibility at the Polling Place

Acknowledgments. This Guide uses or derives best practices from the the Department of Justice (DOJ)'s [ADA Checklist for Polling Places](#), the [2010 ADA Standards for Accessible Design](#), the EAC's [Best Practices for Accessible In-Person Voting Guide](#), the EAC's [voting accessibility video series](#), [ADA.gov's page and resources on polling places](#), the Access Board's [Guide to the ADA Accessibility Standards](#), and the [AccessibilityOnline 2018 webinar on accessible polling places](#).

The accessibility of polling places involves both physical and programmatic accessibility. Physical accessibility is whether people with disabilities can enter the polling place and use facilities like bathrooms, lines, voting machines, and kiosks. Programmatic accessibility is whether people with disabilities can understand how to vote from the information you provide, and whether your policies and practices make voting easier or harder for them.⁵

This Guide section provides best practices and recommendations for making your polling place and in-person voting more accessible. It focuses mainly on physical accessibility but does touch on programmatic accessibility.

Compliance and Location Planning

Polling places must comply with Title II of the Americans with Disabilities Act (ADA). We recommend that you pick a polling place that already does comply with the ADA. Libraries, businesses that must comply with Title III, and state agencies are good options. Prepare to survey the polling place for accessibility in advance even if it is required to comply with Title II. Conditions at polling places can change over time.

Not all polling places are ADA-compliant. This can happen, for example, when you decide to make a church your polling place.⁶ Churches are not required to comply with the ADA. Private homes also do not have to comply with the ADA.⁷ In this situation, you will have to make the polling place temporarily accessible.

The [ADA Standards for Accessible Design](#) are the minimum standards for an accessible building. They cover everything related to physical accessibility. They can be referenced to determine both what needs to be fixed and what an accessible building looks like. The Access Board released a

⁵ See United Way of South Central Michigan, *Day 8: Accessibility: Physical and Programmatic* (Aug. 15, 2022), <https://unitedforscmi.org/day-8-accessibility-physical-and-programmatic/> (describing the difference between physical and programmatic accessibility).

⁶ Daniel Silliman and Jared Boggess, *20% of Polling Places Are in Churches. We Mapped Them*. Christianity Today (Oct. 3, 2022), <https://www.christianitytoday.com/ct/2022/october/church-polling-place-election-democracy.html>.

⁷ ADA National Network, *Religious Entities Under the Americans with Disabilities Act (2018)*, available at <https://adata.org/factsheet/religious-entities-under-americans-disabilities-act>.

[Guide to the ADA Accessibility Standards](#). We recommend that you familiarize yourself with these resources.

There are a few resources specific to polling place physical accessibility. DOJ’s “[ADA Checklist for Polling Places](#)” offers a list of elements needed for a polling place to be accessible. Familiarize yourself with DOJ’s list of requirements. DOJ covers parking and passenger drop-off, ramps, signage, entrances, lifts and elevators, voting area accessibility, and other topics.

ADA.gov’s resource “[Solutions for Five Common ADA Access Problems at Polling Places](#)” describes temporary solutions that election administrators can use to make an inaccessible polling place more accessible. Some of their solutions are using traffic cones and signs to create accessible parking spaces, covering uneven walkways with metal plates, and propping open doors and adding temporary ramps to create accessible entrances.

This Guide strongly recommends that you use temporary fixes instead of closing polling places. In January 2020, NDRN published a policy brief, [Blocking the Ballot Box: Ending Misuse of the ADA to Close Polling Places](#). In the brief, NDRN explains that the ADA has been used as a pretext to close polling places in areas with financial constraints or a high minority population.⁸ NDRN’s report [describes additional temporary fixes](#) that you can use to make a polling place temporarily accessible.

If a polling place can never comply with the ADA, you may be able to consolidate or relocate it.⁹

Recommendations for Consolidating Polling Places

- Make sure the consolidated polling place can handle the increased traffic.
- Carefully consider where to place the consolidated polling place, to ensure it is close enough to accessible public transit and all areas served by the prior polling places.
- Make sure relocation is undertaken after consulting with the local disability rights community. The local disability rights community will tell you whether a proposed new polling place location adequately serves their needs.

⁸ See Erika Hudson and Michelle Bishop, Nat’l Disability Rts. Network, *Blocking the Ballot Box: Ending Misuse of the ADA to Close Polling Places* 9, 15-16, 37-38 (Jan. 2020), available at https://www.ndrn.org/wp-content/uploads/2020/01/NDRN_Blocking_the_Ballot_Box_2020.pdf (“Not all voices are being heard on Election Day, and worse, they are being deliberately silenced ... In 2018, the state of Georgia was undergoing a heated, historic gubernatorial election with the state’s first-ever female African American candidate to run for governor, Stacy Abrams”).

⁹ Erika Hudson and Michelle Bishop, Nat’l Disability Rts. Network, *Polling Place Accessibility: The Recommendations* 3 (Jan. 2020), available at https://www.ndrn.org/wp-content/uploads/2020/01/NDRN_Blocking_the_Ballot_Box_2020_PracticalSolutions.pdf.

About Voter ID Laws

Acknowledgments: This section is derived from the American Civil Liberties Union (ACLU)'s July 16, 2021 comments to the National Institute of Standards and Technology (NIST) on "Executive Order Promoting Access to Voting (NIST-2021-0003); Request for Information regarding Executive Order 14019 § 7 (Ensuring Equal Access for Voters with Disabilities); Docket Number 210608-0123." The ACLU is a member of the NCAV and provided us with their comments. We cite them as "ACLU Brief."

Polling places may routinely require voters to have a photo ID in order to vote.¹⁰ However, people with disabilities are less likely to have a photo ID. Some reasons people with disabilities are less likely to have a photo ID may be their poverty or inability to drive.¹¹ Although some states do offer free photo ID cards, voters may have to obtain those cards from locations that are themselves inaccessible.¹²

Recommendations about voter ID

- We recommend that you eliminate the need to present specifically a photo ID. We recommend that you allow people with disabilities to present other documents, or to provide an on-the-spot sworn affidavit, as proof of identity instead of a photo ID. Requiring only one document as proof of identity is recommended.
- We recommend that you provide opportunities to obtain free photo ID cards. These opportunities should be as accessible as possible and should include providing "door-to-door" services if you have the resources or staff time.¹³
- It can be expensive to acquire what's needed to get a free photo ID. One Harvard law school review in 2014 found that a "free" photo ID could actually cost between \$75 to \$175, and far more if the applicant needed to pay for an attorney.¹⁴ Voters were still facing costs, such as payments for birth certificates, in 2022.¹⁵ We recommend that you provide opportunities to acquire free documentation, such as free proof of citizenship and birth certificates.

¹⁰ ACLU Brief at 5-6; S.E. Smith, *Voting is already hard for people with disabilities. Voter ID laws make it even harder.*, Vox, (Apr. 1, 2016, 2:10 PM), <https://www.vox.com/2016/4/1/11346714/voter-id-laws-disabilities>.

¹¹ ACLU Brief at 5-6

¹² S.E. Smith, *supra* note 7.

¹³ ACLU Brief at 6

¹⁴ Richard Sobel, Charles Hamilton Houston Institute for Race and Justice, Harvard Law School, *The High Cost of 'Free' Photo Voter Identification Cards* 2, 15-23, 31 (Jun. 2014), <https://charleshamiltonhouston.org/wp-content/uploads/2015/01/FullReportVoterIDJune2014.pdf>.

¹⁵ Ileana Garnand, *Costs to vote considered modern "poll taxes"*, Center for Public Integrity (Oct. 31, 2022), <https://publicintegrity.org/politics/elections/who-counts/costs-to-vote-considered-modern-poll-taxes/>.

Checklists for Physical Polling Place Accessibility

Disclaimer: Following our recommendations is not intended as legal advice and does not necessarily ensure nor is intended as a substitute for full compliance with federal or state law.

Acknowledgements: We derived the checklist from the recommendations and statements listed in “Acknowledgements” in the “Accessibility at the Polling Place” section of the Guide. These checklists identify the most common accessibility needs in polling places so that you know where to begin when planning for Election Day.

Parking and Arrival

- Is the parking space’s gravel/pavement suitable for wheelchairs? Would a person using a cane or wheelchair slip on the surface? The DOJ’s ADA Checklist for Polling Places’ description of appropriate surfaces is “stable, firm, slip-resistant.”
- How many accessible parking spaces are there?
- Are there both non-van and van-accessible parking spaces?
- Are enough accessible parking spaces available to voters entering the polling place? Are the spaces open and not taken up by election workers?
- Is there enough aisle space?
- Is there a sign for each parking space?
- If you created temporary accessible parking: Did you create a temporary sign?
- Are the accessible parking spaces on a slope or other wheelchair-inaccessible area?
- Are the accessible parking spaces near the accessible entrance to the polling place?
- Is there an easy, accessible way to get from parking to the accessible entrance?
- Are there accessible signs (in Braille) leading Blind people or people with vision disabilities to the entrance?
- Are there personnel on call/poll workers?
- Are drop-off areas accessible to people with disabilities?
- Is the way to the polling place clear of obstructions and vehicles?

Entrances and Inner Signage

- Are there ramps or other ways to reach the accessible entrance?
- Is the door accessible? Can a person with a wheelchair enter through the door? The 2010 ADA Standards for Accessible Design describe standards for doors.
- If the entrance is not accessible, can it be made accessible?
- Can a person with a disability get the door open?

- Is there an accessible route from the door to the hallways leading to the voting area?
- Is the route level and free of obstructions?
- If the route is not free of obstructions, can a Blind person, a person with low-vision, or person with other vision-related disabilities determine where the obstructions are? For example, do traffic cones “show” a blind, low-vision, or person with vision-related disabilities what areas to avoid?
- Is the route wide enough?
- Can a person in a wheelchair comfortably wait in line along the route?
- Is it possible for them to leave the line and go to the bathroom?
- Is the accessible route relatively near to or the same route used by other voters?
- If the accessible route is in a different location for accessibility reasons, do signs tell voters where to find the accessible route?
- If the voting area is on a different floor: Do people with disabilities have an elevator that leads to the floor where the voting room is? Is the elevator functional and unlocked?
- If there is no elevator: Is there another accessible way up to a higher floor, such as a wheelchair-accessible ramp wide enough to accommodate all types of wheelchairs (power chairs, etc.)?
- Are there personnel available who are trained to help voters with disabilities?

Signs

- Are there accessible signs showing voters where to go inside the building?
- Are the signs in plain language?
- Are there signs in Braille?
- Are there signs that use large print?
- Do the signs feature appropriate color contrast between text and background?

Voting Area

- Is the entrance to the voting area accessible?
- Does the entrance comply with the ADA Accessible Design Standards?
- Does the entrance comply with the guidelines in the DOJ Polling Place Checklist?
- If not, have temporary measures been taken to make the entrance accessible?
- Can a person with a disability get between the different lines and sections of the voting area? The DOJ Polling Place Checklist description is “adequate circulation and maneuvering space for voters who use wheelchairs or scooters, or mobility devices.”

Voting Machines (including non-accessible voting machines and kiosks):

- Does the voting equipment (including non-accessible voting machines and kiosks) have enough space/clearance for a person with a wheelchair, including enough space to turn around?
- Are all voting machines situated for privacy? For example, can a person waiting in line see a voter's selections? Can a poll or election worker? If they can, the voting machines have not been situated for privacy.
- Are all voting machines unboxed, including accessible voting machines?
- Are all voting machines set up, including accessible voting machines?
- Are all voting machines turned on, including accessible voting machines?

Voting Area

- Are there signs in the voting area that say what each line or location is for?
- Are there signs for:
 - same-day registration?
 - check-in?
 - ballot casting?
 - Early voting, if it happens in the polling place?
- Are the signs in plain language?
- In Braille?
- Are there trained staff who can direct voters and read the signs aloud?
- If a person with a disability needs an audio ballot read aloud by a machine: Can you reduce or cancel noise so that only the person with a disability can hear their ballot being read?
- Are there headphones available at all polling places?
- Are the headphones nearby the voting machines?
- Have all headphones been tested? Are they ready for use?
- Is there a way to reduce echoes and other audio for people with disabilities using headphones?
- Is there a way to reduce echoes and audio for people with disabilities using assistive hearing-related technology, such as hearing aids and cochlear implants?

Check-in and Same-Day Registration

- Is same-day registration available at the polling place? We recommend that same-day registration be available at the same location as voting.

- Are the same accommodations available for same day registration that are available for check-in and voting?
- Are there signs showing where check-in and same-day registration (if available) are?
 - Are they in Braille?
 - Plain language?
 - Are the signs audible?
 - Can the signs be read aloud by trained poll workers?
- Can poll workers communicate effectively with people with disabilities?
 - Are they trained in disability etiquette?
 - Are they trained on how AAC works?
 - Are there poll workers who can speak ASL fluently? Poll workers who are trained to use a single-page document with a few signs are not speaking ASL.
 - Are there poll workers who can communicate using cued speech?
- Do poll workers use clear, plain language to communicate with voters?

Can poll workers help people with disabilities who do not know where to go figure out where to go?

- Can they help people with intellectual and developmental disabilities?
- People with psychiatric or mental health disabilities?
- Can they help voters who are Deaf, DeafBlind, DeafDisabled, Hard of Hearing, Late-Deafened, and/or people with hearing disabilities?
- Blind people, people with low-vision, or people who have other vision-related disabilities?

People with physical disabilities?

- Can you check in or register to vote using assistive technology and AAC?
- Can you check in or register to vote using assistive apps on an iPad or tablet?
- If there is an e-pollbook: Do all poll workers know how to use it?
- Is the e-pollbook accessible for poll workers with disabilities?
- If there is a signature requirement for voting or same-day registration in the county or state: Are there accessible options for signatures? Accessible options might include small marks that stand in for a signature, electronic signatures, stamps, and affidavits stating that the person authorized another's signature as their own.
- Are alternative formats of instructions and forms available for same-day registration?

- Are the instructions and forms clear?

Accessibility of Voting Machines

Under the Help America Vote Act of 2002 (HAVA), every polling place must have at least one accessible voting machine.¹⁶ “Accessible voting machines” is a term we use to refer to machines designed to have accessibility features. We do not endorse or oppose the use of any specific brand of voting machine, and our statements do not imply that any brand of machine is guaranteed to be accessible to all voters.

Accessible voting machines are usually Ballot Marking Devices (BMDs), which means that voters fill out the ballot electronically, but the machine prints a paper ballot.¹⁷ They may also be Direct-recording Electronic (DRE) voting machines, which are more accessible because they allow voters with disabilities to cast the ballot directly from the voting machine.¹⁸ Some DREs produce a paper ballot that allows voters or election officials to verify the ballot, known as a voter-verified paper audit trail (VVPAT) system.¹⁹

Recommendations for Accessible Voting Machines

Disclaimer: Following our recommendations is not intended as legal advice and does not necessarily ensure nor is intended as a substitute for full compliance with federal or state law.

- Determine what kind of machines you have available, including their accessibility and functions.
- Consider whether you’ve made the machines easy for people with physical disabilities to get to and use.
- Make sure to train your poll workers and employees on accessible voting machines. Poll worker training should include knowledge of the features that the machines offer, information on how to help voters use the machines (including all features), and knowledge of how to take down and set up the machines.

Most states and counties try to follow the EAC’s [Voluntary Voting System Guidelines \(VVSG\)](#), which govern voting machines. Some states are required by state law to follow the VVSG.²⁰ Familiarize

¹⁶ Help America Vote Act, 52 U.S.C. § 21081(a)(3)(B)(2022).

¹⁷ Verified Voting, *Voting Equipment*, <https://verifiedvoting.org/votingequipment/> (last visited Mar. 13, 2024).

¹⁸ Id

¹⁹ Congressional Research Service, *The Direct Recording Electronic Voting Machine (DRE) Controversy FAQs and Misperceptions 1* (Mar. 7, 2007), *available at* <https://crsreports.congress.gov/product/pdf/RL/RL33190/6>; *Voting methods and equipment by state*, Ballotpedia, https://ballotpedia.org/Voting_methods_and_equipment_by_state#cite_note-verify-1 (last visited Mar. 13, 2024).

²⁰ U.S. Election Assistance Commission, *Voluntary Voting System Guidelines*, <https://www.eac.gov/voting-equipment/voluntary-voting-system-guidelines> (last updated Feb. 5, 2024).

yourself with these guidelines and follow their recommendations to improve the accessibility of your voting machines.

It is particularly hard to make ballot verification accessible. Printed paper ballots do not allow voters with print disabilities to confirm what is on their ballot. Newer machines automate paper handling or have other accessible features that improve accessibility. We recommend that you keep your voting machines as up-to-date as possible.

Our checklists and recommendations describe features of your voting area, poll worker training, and voting machines that would make voting machines more accessible to people with disabilities.

Checklist for Training Poll Workers in the Voting Area

Disclaimer: Following our recommendations is not intended as legal advice, and does not necessarily ensure nor is intended as a substitute for full compliance with federal or state law.

Acknowledgments: This Guide thanks Diane Golden for speaking with us during the Guide's development. The Guide also thanks Sarah Blahovec for discussing in-person physical accessibility with us in depth. This Guide used NDRN's [comments on VVSG 2.0](#) and the [EAC's Checklist for In-Person Voting](#) to write this section.

- Are headphones and touchpad pens available to all voters?
 - Can the poll workers operate all voting machines, including accessible voting machines?
 - Can the poll workers instruct people with disabilities on how to use the voting machine?
 - Can they instruct Blind and low-vision voters, and voters with other vision-related disabilities?
 - Voters with physical disabilities?
 - Voters with cognitive disabilities?
 - Voters with psychiatric or mental health disabilities?
 - Are they fluent in ASL?
 - Can they communicate using cued speech?
- Are the poll workers aware that accessible voting machines exist?
- Are poll workers trained to tell all voters where the accessible voting machine is?
- Is the accessible voting machine turned on and operational?
- Are the voting machines compatible with assistive technology (AT)?

- Are the voting machines compatible with iPads or tablets?
- AAC devices?
- Are headphones and technologies related to the machines plugged in and operational? Are these technologies nearby the voting machines?
- Are the voting machines arranged for secrecy?
- Do the poll workers use proper disability etiquette when assisting voters? “Providing Information In Person” has more information.
- Do the poll workers ask all voters whether they plan to hand mark their ballot or use a voting machine, when both options are available?
- When more than one kind of voting machines is available: Do the poll workers explain which types of machines are available (including their features and accessibility if asked about) without directing the voter to use a specific machine?
- Do they presume all people are competent to vote? Poll workers should presume all voters are competent. Only a judge can determine whether a voter is competent to vote or not.
- Do they only disqualify voters when they have documents showing that specific person cannot vote?
- Does the poll worker stand off to the side unless they are being asked to mark the ballot?
- Does the poll worker stand on the opposite side of any service animal?
- Do they let the voter know if they have to look at the machine in order to help them? Do they ask for permission first?
- Do poll workers preserve privacy and independence as much as possible?

Recommendations on Accessible Voting Machines and Voting Systems

Acknowledgments: We thank Diane Golden for consulting with us on voting machine and voting system accessibility. We also used NDRN’s [comments on VVSG 2.0](#) to write this section of the Guide.

All voting machines must comply with federal and state law and regulations governing accessible voting systems. Review your state’s policies and federal and state disability and voting rights law first.

- We recommend that you get machines that are certified for compliance with VVSG 2.0 even if you are not required to comply with the VVSG in your state. The current VVSG are minimum accessibility standards.

- Use voting systems that provide accessible paper ballot marking, verification, and return. Consider the needs of people with print disabilities, especially those who cannot handle paper, when determining which voting systems to replace or purchase. A person who requires the help of a poll worker to remove the ballot from a machine to place it into a scanner is not voting privately and independently, even if a privacy sleeve is used.
- Use universal design and accessibility features in all voting machines. Standard, built-in accessibility is better for voters than segregated BMDs.
- Upgrade your voting machines regularly as accessible voting technology improves.
- Use accessible voting machines with common, standard AT features, such as:
 - Speech output, with adjustments available for speech speed, loudness, etc.
 - Screen enlargement with adjustments available for color, contrast, size, and other features needed by people with vision disabilities
 - Full touchscreen control support, including when the screen is enlarged
 - Audio navigation with a keypad used to make selections
 - Alternative controls (such as a switch, or “sip-and-puff” air-based controls) not used in conjunction with audio navigation
 - The ability for the voter to select the access features they need.
- If the ballot is read aloud to the voter by the machine, this should not be audible to any other voter or to election officials. Headphones must be functional, including for voters using hearing-related assistive technology such as cochlear implants and hearing aids.
- Stay on the “cutting edge” of voting machine technology to help make voting more accessible for people with disabilities! We recommend machines with the following features, if (or when) they exist.
 - Acquire voting machines that allow users with disabilities to verify printed paper ballots. For example, machines could use encoding (such as a QR code or use of optical scan markings, which are two kinds of encoding) on the paper ballot. Voters could scan the code and then verify their ballot on an AT device, computer, iPad, or phone.
 - If optical scan marks are used to verify marked paper ballot content, it may be possible to develop voting machines that “read back” write-in content, such as the name of a “written in” candidate. Look for future machines with this characteristic.
- If the voting machine creates a paper ballot, we recommend the voting machine have an attached ballot box where the marked and verified ballot is automatically sent. Voting machines that do this do exist and have been deployed in some jurisdictions.
- Accessible voting machines frequently produce ballots that do not look like the ballots used by other voters. Dissimilar ballots make it too easy to determine who used the

accessible voting machine. We recommend that you use more than one accessible voting machine, enough for voters without disabilities to use them. Another option is to use voting systems that produce ballots that are tabulated and look exactly the same as handwritten paper ballots.

Poll Worker Training and Safety

Trained poll workers can be the difference between an accessible voting experience and an inaccessible one.

Recommendations

- This Guide discusses disability etiquette and training in other contexts. Our recommendations in these sections also apply to poll workers. Reference our “Checklist for Poll Worker Training for the Voting Area,” “Checklists for Physical Polling Place Accessibility,” “Checklist” under “Registering to Vote In Person,” and “Providing Information In Person” sections for more information.
- Engage with advocacy organizations who are recruiting diverse poll workers, including poll workers with disabilities. For example, [NDRN partnered with Power The Polls](#) to recruit poll workers with disabilities in 2023.
- Poll workers, other election workers, and election administrators are facing unprecedented threats to their safety nationwide.²¹ We recommend that you provide security for yourselves and your poll workers at the polls to the extent that you are able to. Your safety is vital for the preservation of secure and free elections.
- Make sure that your polling place is prepared in case of an emergency. Emergency events, including natural disasters and pandemics, can and have impacted elections. Make sure that your poll workers are aware of nearby shelters, or that the polling place is prepared if it is also designated as a shelter. Make sure that your emergency exits, walkways, and entrances are accessible. If an incoming natural disaster closes a polling place, make sure that there are accessible notices available online, at the polling place, and at your office.

²¹ Lindsay Whitehurst, Associated Press, *Election workers are being bombarded with death threats, the U.S. government says*, PBS News Hour (Aug. 31, 2023, 6:49PM EDT), <https://www.pbs.org/newshour/politics/election-workers-are-being-bombarded-with-death-threats-the-u-s-government-says>.

Appendixes

In the Appendix

- [Federal regulations and guidance on voting and accessibility](#)
- [Terminology](#)
- [List of NCAV Member Disability Rights Advocacy Organizations](#)

Federal regulations and guidance on voting and accessibility

Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973

All state and local election offices are covered by Title II of the Americans with Disabilities Act of 1990. Their “services, programs, or activities” cannot discriminate against people with disabilities.²² Section 504 requires agencies that receive federal funding to not discriminate against people with disabilities.²³ Section 504 provides voters with similar rights to those provided by the ADA.

The U.S. Code is available through the U.S. Government Publishing Office (GPO)’s GovInfo website at: <https://www.govinfo.gov/app/collection/USCODE>. The ADA is in Title 42, Chapter 126 of the U.S. Code. Section 504 is in Title 29, Chapter 16, Subchapter V of the U.S. Code.

Both the ADA and Section 504 have regulations. ADA regulations for Titles II and III are available at: <https://www.ada.gov/law-and-regs/regulations/>. Many agencies have Section 504 regulations pertaining to their specific jurisdiction area. Election agencies should look to the Section 504 regulations issued by the federal agency that is funding the state or local government’s activities, or the U.S. Department of Justice (DOJ), for specific guidance.

- The ADA’s 2010 ADA Standards for Accessible Design describe requirements for physically accessible buildings. They are available at: <https://www.ada.gov/law-and-regs/design-standards/>.
- The U.S. Department of Justice (DOJ) provides resources and guidance on voting, including a checklist on polling place accessibility, at <https://www.justice.gov/voting/accessibility-voting>.
- The U.S. Access Board’s Guide to the ADA Accessibility Standards is an excellent resource for physical accessibility. It is available at: <https://www.access-board.gov/ada/guides/chapter-1-using-the-ada-standards/>.
- The ADA National Network is an excellent general ADA resource: <https://adata.org/>.
- The Department of Justice released [final regulations on web accessibility](#) for Title II of the Americans with Disabilities Act in April 2024. This rule will require covered agencies to adhere to at least the Web Content Accessibility Guidelines (WCAG) 2.1.

²² 42 U.S.C. § 12132 (2022).

²³ 29 U.S.C. § 794 (2022).

- The Department of Justice updated its guidance on [voting rights and disability](#) in April 2024. The new guidance clarifies people with disabilities’ voting rights, including their right to assistance and right to be free of categorical disqualification from voting because of their disabilities or guardianship status.

Section 508 of the Rehabilitation Act of 1973

Section 508 of the Rehabilitation Act of 1973 covers electronic and information technology accessibility. Federal agencies and agencies that receive federal funds must comply with Section 508. [Section 508.gov](#) provides covered agencies with detailed information and guidance.

Help America Vote Act (HAVA)

HAVA, passed in 2002, provides many protections to voters with disabilities. Voters with disabilities must have the “same opportunity for access and participation (including privacy and independence) as for other voters.”²⁴ HAVA resources can be found at: https://www.eac.gov/about/help_america_vote_act.aspx.

EAC Resources

The Election Assistance Commission (EAC) serves as a “national clearinghouse” of information on elections and election administration.²⁵ The EAC has a list of accessibility resources for election officials, including a webinar series, at <https://www.eac.gov/voting-accessibility>.

National Voter Registration Act Of 1993 (NVRA)

The NVRA requires Departments of Motor Vehicles (DMVs) to offer voter registration. Public assistance offices and offices that primarily serve people with disabilities must do the same.²⁶ The NVRA is often called the “motor voter” law. The Department of Justice has a question-and-answer sheet on the NVRA at <https://www.justice.gov/crt/national-voter-registration-act-1993-nvra>.

²⁴ 42 U.S.C. § 15481(a)(3)(A); Bazelon Center for Mental Health Law, Autistic Self Advocacy Network, National Disability Rights Network, Schulte Roth & Zabel LLP, and Akin Gump Strauss Hauer & Feld LLP, *A Guide to the Voting Rights of People With Mental Disabilities 10-11* (2020) [hereinafter “Bazelon Mental Disabilities Voting Rights Guide”].

²⁵ *About the EAC*, U.S. Election Assistance Commission, <https://www.eac.gov/about> (last visited 3/1/2024).

²⁶ U.S. Dept. Justice Civ. Rts. Div., *The National Voter Registration Act Of 1993 (NVRA)*, <https://www.justice.gov/crt/national-voter-registration-act-1993-nvra> (last updated Jul. 20, 2022).

Voting Accessibility for the Elderly and Handicapped Act of 1984 (VAEHA)

VAEHA requires that polling places and voter registration be accessible to elderly people and people with disabilities.²⁷ The Department of Justice enforces this law and can be consulted on compliance.

²⁷ 52 U.S.C. § 20102, 20104 (2022).

Terminology

These are some terms we use in the guide to refer to people with disabilities or who work in elections.

- **“Election officials”** and **“election administrators”** are interchangeably used to refer to state, county, and local personnel who manage and oversee federal, state, and local elections. They are the main audience for this Guide; we refer to them as “you” throughout.
- **“Poll workers”** refers to election workers who help people vote, as well as manage and run polling places and voting centers.
- **“Autistic people”** refers to people on the autism spectrum.
- **“Blind people, people with low-vision, and people with vision-related disabilities”** refers to vision-related disabilities.
- **“Deaf, DeafBlind, DeafDisabled, Hard of Hearing, Late-Deafened, and people with hearing disabilities”** refers to people with hearing disabilities.
- **“People with cognitive disabilities”** refers to people with disabilities that affect the mind who do not have a developmental disability and do not have a psychiatric or mental health disability.
- **“People with intellectual and developmental disabilities”** refers to people with IDD. According to the National Institutes of Health’s Eunice Kennedy Shriver Institute of Child Health and Human Development, intellectual and developmental disabilities (IDDs) are disabilities that are “usually present at birth and that uniquely affect the trajectory of the individual’s physical, intellectual, and/or emotional development. Many of these conditions affect multiple body parts or systems.” Some examples of IDDs are autism, cerebral palsy, Down syndrome, fetal alcohol syndrome, intellectual disability, and spina bifida.
- **“People with psychiatric or mental health disabilities”** refers to people with these disabilities.
- **“People with print disabilities”** refers to people whose disabilities make it hard or impossible for them to access or handle printed paper and text.²⁸

²⁸ Nat’l Disability Rts. Network and Am. Assoc. People with Disabilities, Making Voting Accessible to Voters with Print Disabilities 2 (Jul. 24, 2021), <https://www.aapd.com/wp-content/uploads/2023/06/Making-Voting-Accessible-to-Voters-with-Print-Disabilities-1.pdf>.

List of NCAV Member Disability Rights Advocacy Organizations

International Cross Disability

- [World Institute on Disability](#)

National Cross Disability

- [American Association of People with Disabilities](#)
- [National Association of Statewide Independent Living Councils \(NASILC\)](#)
- [Association of Assistive Technology Act Programs \(ATAP\)](#)
- [Association of Programs for Rural Independent Living \(APRIL\)](#)
- [Association of University Centers on Disabilities](#)
- [Disability Rights Education and Defense Fund \(DREDF\)](#)
- [National Council on Independent Living](#)
- [National Disability Rights Network](#)
- [RespectAbility](#)

Regional Cross Disability

- [Center for Living and Working](#)
- [Independent Living Center of the Hudson Valley](#)
- [New Disabled South](#) (disability advocacy in Southern states)

Blindness and Low Vision

- [American Council of the Blind](#)
- [National Federation of the Blind](#)

Deaf, DeafBlind, DeafDisabled, Hard of Hearing, Late-Deafened, and People with Hearing Disabilities

- [National Association of the Deaf \(NAD\)](#)

Mental Health/Psychiatric Disabilities

- [Bazelon Center for Mental Health Law](#)

Physical Disabilities

- [Paralyzed Veterans of America](#)
- [United Spinal Association](#)

Autism

- [Autistic Self Advocacy Network](#)
- [Autism Society of America](#)

Intellectual and Developmental Disability

- [National Association of Councils on Developmental Disabilities \(NACDD\)](#)
- [Self Advocates Becoming Empowered \(SABE\)](#)
- [The Arc](#) of the United States

Natural Disasters and Disability

- [The Partnership for Inclusive Disaster Strategies](#)