



U.S. ELECTION ASSISTANCE COMMISSION

633 3rd St. NW, Suite 200
Washington, DC 20001

EAC Decision on Request for Interpretation 2025-02 Accessibility features

Sections of Standards or Guidelines:

5.1-D Accessibility features

Accessibility features must be integrated into the manufacturer's voting system so accessibility for voters with disabilities is supported throughout the voting session, including any steps to activate the ballot at the voting station, ballot marking, verification, and casting.

Discussion

This requirement ensures accessibility to the voter throughout the entire session. Not only are individual system components (such as ballot markers, paper records, and optical scanners) accessible, but they also support voters with disabilities throughout the process of voting, from activation through casting. Requirements for individual system components are described in *Principle 7: Marked, Verified, and Cast as Intended*. This general requirement supports HAVA. [HAVA02].

Date:

May 16, 2025

Question(s):

Is it required that every voter-facing device (including ballot markers, stand-alone optical scanners, and hybrid ballot markers capable of both marking and tabulating ballots) at all voting locations (such as polling places, voting centers, and early voting sites) include assistive technologies (such as tactile keypads, headphones, and personal assistive technology switches)?

Discussion:

VVSG 2.0, Principle 5, Equivalent and Consistent Voter Access, states that all voters can access the voting system regardless of their abilities. Guideline 5.1 states that voters have a consistent experience throughout the voting process within any method of voting. This means that all voters must be provided with the same display formats and interaction modes for all information and instructions related to casting votes.

With VVSG 2.0, accessibility is implemented at the overall voting system level, rather than the individual device level. As a result, it is not possible to state that a



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particular type of device, for example, a precinct count optical scanner (PCOS), must always include a particular type of accessible functionality.

For each voting system, requirement **5.1-F Accessibility documentation** states that the manufacturer must include descriptions and instructions for all accessibility features in their documentation. This documentation must recommend procedures that fully implement accessibility for voters with disabilities, and how the voting system supports those procedures.

Requirement **5.1-D Accessibility features**, itself and its discussion, states that all documented accessibility features must be available for the entire voting session. This session includes ballot activation, marking, verification, changing any selections, and finally casting the ballot. Voting systems must include a fully accessible device that allows a voter to activate, mark, verify, change selections if desired, and finally cast their ballot, without having to handle the paper.

For equipment that does not include this all-in-one functionality, devices must support accessibility for their functionality as intended by the manufacturer. This question is more specifically aimed at those devices that do not contain all functions. This is best observed through the lens of a PCOS, where voters are intended to only cast their ballot without the need to activate, mark, verify, or change their selections.

The VVSG 2.0 pulls from Section 508 of the Rehabilitation Act and the Americans with Disabilities Act (ADA) for voting system compliance. These Acts contain requirements that apply to devices used both in and outside of voting systems, such as scanners, copiers, and printers. This is useful in the sense that they share similar functionality with handling paper and electronic displays as those devices in a voting system, like a PCOS device. Considerations for these devices and accessibility include reachability, low vision, color blindness, hearing difficulty, and cognitive issues.

For physical access, reachability is an ADA requirement and is covered in principle 7 with requirements like **7.2-P Floor Space**, **7.2-Q Physical dimensions**, and **7.2-R Control labels visible** (braille labels also reachable). These apply to voting stations in the polling place that include PCOS devices used for casting the paper ballot.

For physical buttons, no requirement applies to accommodate a voter who cannot independently submit their ballot or push buttons. The voter would need the use of a fully accessible voting device that includes all functionality required to activate, mark, verify, change as desired, and cast their ballot. Requirements for physical buttons, such as **7.1-P Identifying controls**, **7.2-H Accidental activation**, and **7.2-K Key operability**, apply to the PCOS.

For electronic displays, a PCOS has much simpler functionality compared to a ballot marking device (BMD). Precinct scanners are intended to notify the voter that their ballot has been cast or needs to be returned for corrections. Requirements for the



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electronic display cover considerations around low vision and colorblindness through principles 7 & 8 of the VVSG 2.0. Guideline 7.1 includes color, contrast, font size, and scaling among other requirements that apply to electronic interfaces. Principle 8 also covers items such as minimum size, resolution, and anti-glare. These all apply to PCOS devices.

For cognitive issues, requirements such as **7.3-K Warnings, alerts, instructions** and **7.3-P Plain language** are applicable, and must be applied to the PCOS.

Beyond the identified considerations of accessibility, principles 7 and 8 cover related topics of notifications, audio settings, feedback, and ballot correction. These requirements apply to PCOS devices.

- **7.1-K Audio settings** notes that volume needs to be adjustable for those low vision/hard-of-hearing voters. Speech frequency and audio privacy are not expected because it is needed for efficiency in reading the ballot, rather than notifications.
- **7.3-H Overvotes** states: "A scanner or other device that a voter uses to cast a paper ballot must be capable of providing feedback that identifies specific contests that have been overvoted in visual format, and with either audio format or sound cues." Because the visuals can be enlarged for voters with low vision to show the overvoted contests, either sound cues or an audio format meets this requirement. Voters who are blind would not be using this system independently, as they cannot read their paper ballot.
- **7.3-I Undervotes** indicates that there must be a visual and an audio format, and not just audio cues.
- **7.3-J Notification of casting** notes that audio and visual formats are required for notifications.
- **8.1-E Standard audio connectors** and **8.1-F Discernable audio jacks** requires an audio jack to support those with poor hearing. This will also minimize noise in the polling place if any voter needs to turn the volume up.

Therefore, it is expected that every voter-facing device, at all voting locations, will include the assistive technologies applicable to their corresponding functionality. While a PCOS device may include tactile keypads or headphones, an audio jack must be made available with volume control to meet applicable requirements. Hybrid and all-in-one devices must accommodate all accessibility requirements. BMDs must meet applicable requirements corresponding to their intended functionality, which may include paperless handling and casting.

Conclusion:

It is not a requirement of VVSG 2.0 that every voter-facing device, at all voting locations, includes all assistive technologies. However, it is a requirement that the voting system in all voting locations must support the accessibility needs of individuals to create an equivalent voting experience. It is expected that every



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voter-facing device, at all voting locations, will include the assistive technologies applicable to their corresponding functionality.

Effective Date:

As of the date this document is published.