

FLORIDA COUNCIL OF THE BLIND, INC.
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August 9, 2021

Honorable (First and Last Name), Supervisor of Elections (County Name) County

Email address

Dear Honorable Supervisor(Last Name):

On behalf of the Florida Council of the Blind, we want to thank you in advance for your implementation of accessible absentee vote/by-mail in your county. Over the past 20 years, the Florida Council of the Blind has worked tirelessly to promote and secure the availability of accessible voting in our state. Last year we initiated litigation to ensure that all Florida counties make accessible vote-by-mail available to all Floridians who need or want to vote at home. We continue to strive to ensure the complete, full and equal access to every aspect of the voting process in Florida for all, including persons with disabilities.

The intent of this Accessible Absentee/ VBM Best Practices letter is to assist you with your selection and implementation of the now required accessible Absentee/Vote by Mail Program.

6 Best Practices

When implementing Accessible Absentee/Vote by Mail, we strongly urge you to keep the following in mind.

1. Promotion of the accessible VBM tool is as essential and important as is the actual accessible VBM solution itself. Please make sure that you develop and implement a plan to fully educate your community on the availability and mechanics of your new accessible at-home VBM option.

2. Ensure that all ballots for the county have been pre-loaded, tested and have been determined to be accessible, in advance of each election. Having all the ballots for the entire county pre-loaded and tested in advance of the election will ensure that both voters and elections' staff will not have to wait for ballots to be remediated or modified by the vendor before sending them to the voter. Not doing this could cost time that you will most likely not have and will certainly increase the potential for the additional risk of intrusion and errors.

3. There are over ninety combinations of browsers, screen readers and operating systems that voters with disabilities use on their personal computers and electronic access devices. It is critical that your accessible vote by mail (AVBM) solution deploys ballots that have been both fully reviewed and approved to meet all of the various combinations of available browsers, screen readers and operating systems. This is especially significant in our state where the visibility, scrutiny and proper functionality of our voting process is so carefully monitored and watched all around the country.

4. Voters with mobility challenges such as Parkinson's, Palsy and paralysis use their own assistive devices. The system you use needs to be able to work with these products as well. A proven track record of your chosen vendor, in this regard is certainly going to be most helpful and would work to everyone's benefit.

5. Advantage of growth in usage. Accessible vote by mail use tends to grow with each election cycle. A history of prior usage is certainly beneficial in demonstrating this. To get more "bang for the buck", most jurisdictions use their AVBM solution to more securely deploy electronic ballots to military and overseas voters. While because of a very late deployed and not particularly well-developed educational effort, the pilot project exhibited extremely minimal usage, we are confident that with a successful deployment of an AVBM system along with the development and promotion of education about the existence and availability of the program, usage thereof will dramatically increase and exponentially grow over time. Natural disasters, pandemics and other emergencies are certainly additional reasons to have in place a robust fully vetted electronic accessible ballot delivery (and return) system.

6. Due to heightened awareness of security in elections, it is recommended that all accessible absentee/VBM systems selected should have undergone full and complete independent security reviews and scrutiny, meet the NIST Cybersecurity Framework guidelines and be approved by the State of Florida. Not doing so will most likely lead to problems down the road, especially as the availability and usage of the accessible VBM system becomes more widely known and used.

Please feel free to contact the Florida Council of the Blind with any questions or concerns related to implementation of this important new accessibility voting initiative.

Thank you for your attention and consideration.

Respectfully,

Sheila Young, President

Florida Council of the Blind

James K. Kracht Esq.

Immediate Past President

Florida Council of the Blind

cc: Matthew Dietz, Attorney for Florida Council of the Blind