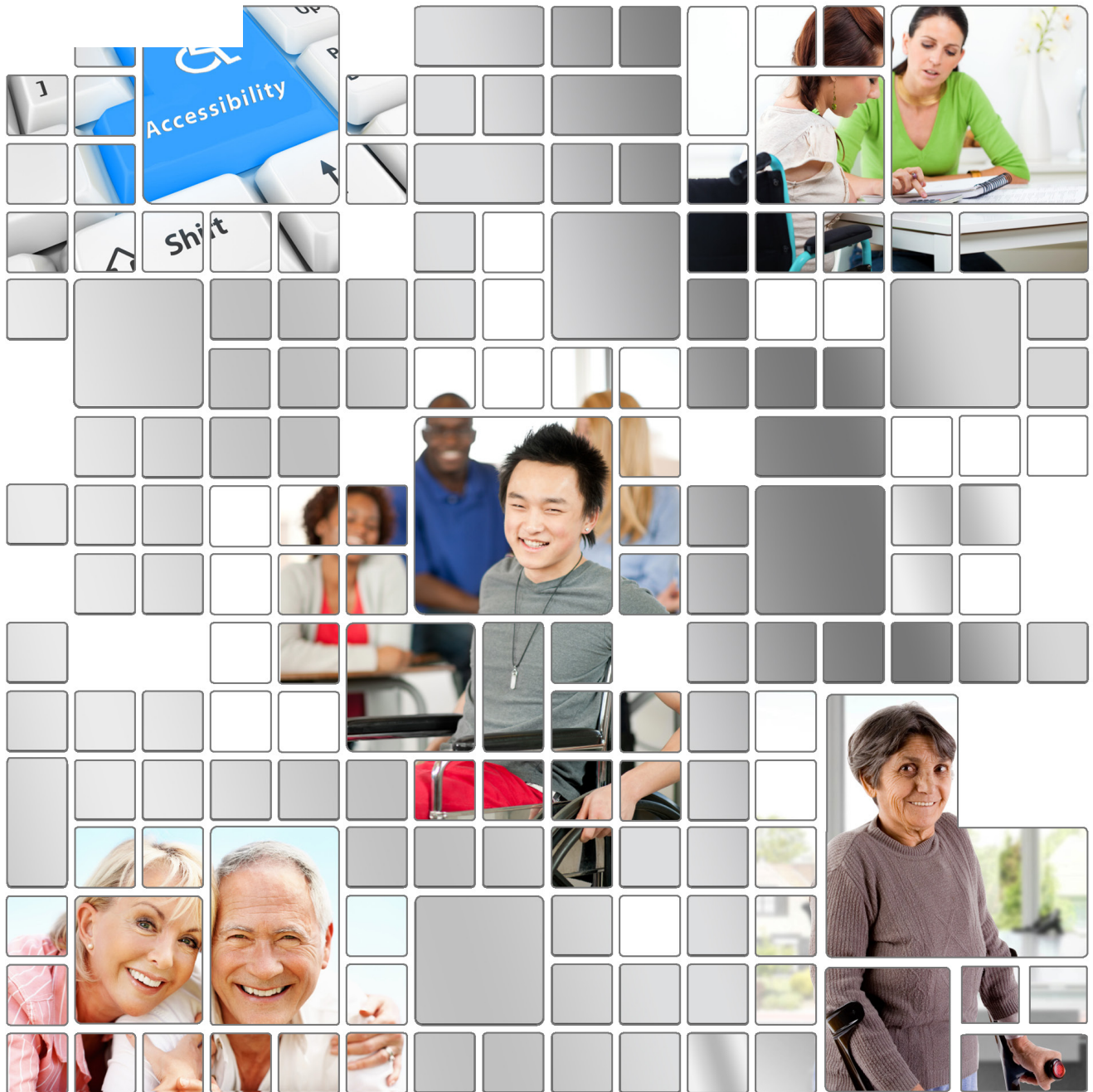




# Accessibility for Voters with Disabilities 2013



Dean C. Logan  
Registrar-Recorder/County Clerk



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# Introduction





## Los Angeles County Registrar-Recorder/County Clerk

A disability can mean physical, mental, intellectual or sensory impairments that may hinder effective participation in society and these disabilities can affect people of all ages, races, and economic backgrounds. It is reported that 650 million people worldwide are living with a disability, making it the world's largest minority.<sup>1</sup> Los Angeles County in particular, contains nearly one in five adults living with some form of disability. When it comes to voting, people with disabilities are less likely than others to cast a ballot in an election. This was apparent in 2010 when closing the disability voting gap would have led to 3 million more voters, possibly changing the outcomes of some elections throughout the Country.<sup>2</sup> Because of this, it is fundamental to our democracy to make voting accessible for all eligible voters, especially those with disabilities.

While substantial progress has been made since the passage of the Americans with Disabilities Act of 1990 (ADA) and the Help America Vote Act of 2002 (HAVA), barriers to full participation in the electoral process still exist for people with disabilities. According to a study in 2008, people with disabilities had a voter turnout 11 percentage points lower than those without disabilities. Some of the barriers for this are a lack of access to voting sites and difficulties with transportation.<sup>3</sup> In 2008, the United States Governmental Accountability Office found that only 27% of surveyed polling sites had no impediments in the path from the parking area to the polling place while another 27% did not even offer curbside voting.

However, in Los Angeles County, the Registrar-Recorder/County Clerk's office (the Department) has been working diligently to ensure full accessibility of elections for people with disabilities. The Department has made considerable steps over the past decades in surveying, recruiting, modifying, and retaining accessible polls. In 1986, only 70% of Los Angeles County's polls were physically accessible whereas now, 99% of polling places have a high level of accessibility for voters with disabilities.

The County is committed to continuing its comprehensive approach in complying with state and federal accessibility requirements and achieving its objective in providing fair, accessible and transparent election services for all voters. This report describes the numerous services the Department provides for those with specific needs and the Department's goals in continuing to serve and foster a diverse electorate.

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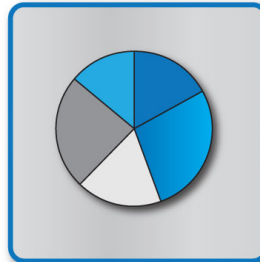
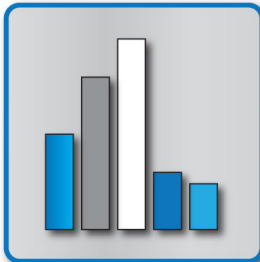
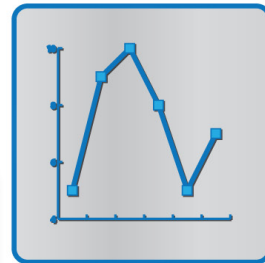
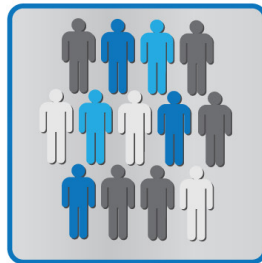
<sup>1</sup> Renzo Ramella. "Fact Sheet on Persons with Disabilities," United Nations Enable, last modified October 27, 2009, <http://www.un.org/disabilities/default.asp?id=18>.

<sup>2</sup> Anthony Adornato. "BBI study reveals people with disabilities are sidelined in American politics," Syracuse University News, September 11, 2012, <http://www.syr.edu/news/articles2012/bbi-politics-09-12.html>.

<sup>3</sup> Ibid.



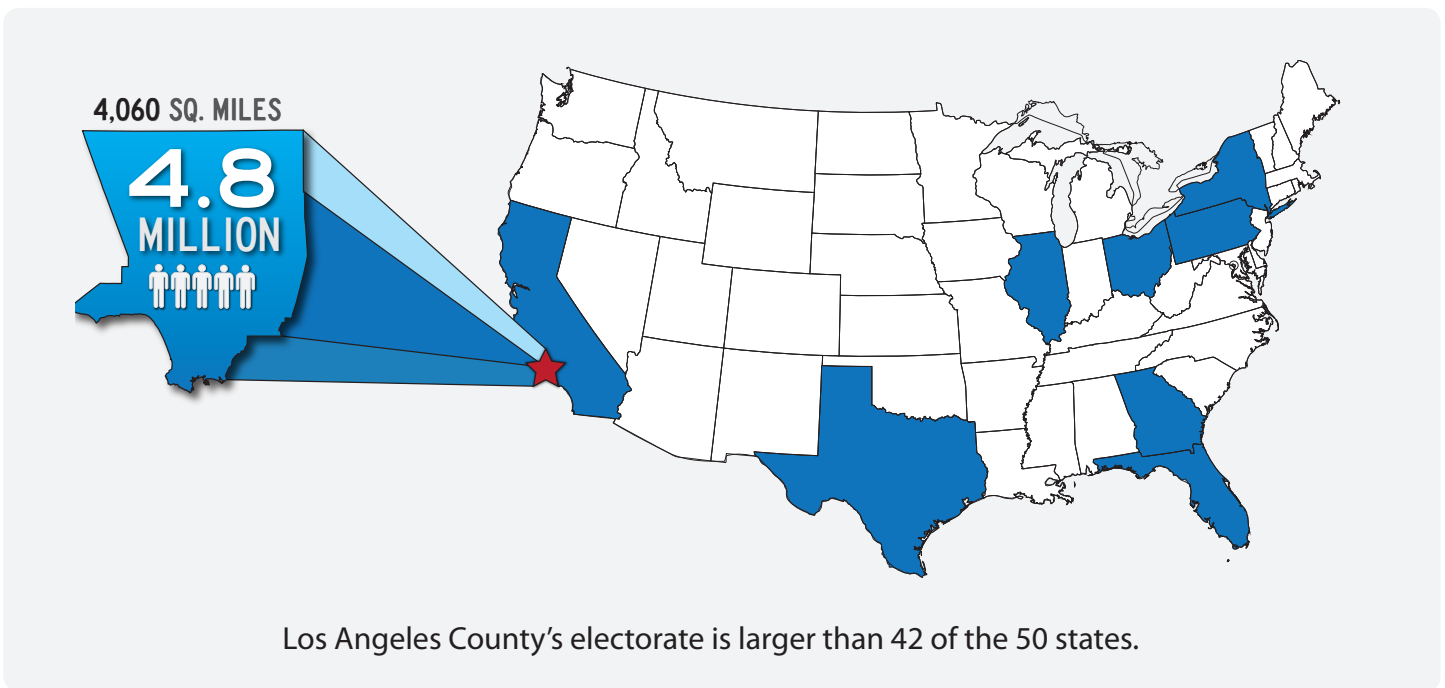
# Demographics





## Los Angeles County Registrar-Recorder/County Clerk

With an electorate larger than 42 of the 50 states, Los Angeles County is the largest and most diverse county election jurisdiction in the nation, serving nearly five million voters in 16 different languages. Composed of 88 cities and 2,649 square miles of unincorporated areas, the County administers elections across 500 political districts, including its five-member Board of Supervisors and municipal governments. This complexity means that on Election Day, the Department manages more than 25,000 volunteers and nearly 5,000 polling places in a single day.



According to a 2007 Los Angeles County Health Survey, 19.6% (1.46 million) of voting age adults in the County reported having a disability. The likelihood of reporting a disability increased with age, with 10.5% of 18 to 24 year olds reporting a disability compared to over 39% of those 65 years or older.<sup>4</sup> Additionally, the County's 2002-03 Health Survey found that 79% of people with disabilities have a physical disability, 45% reported a sensory disability (difficulty hearing or seeing), 17% reported a mental health condition, and 16% reported problems with learning.<sup>5</sup>

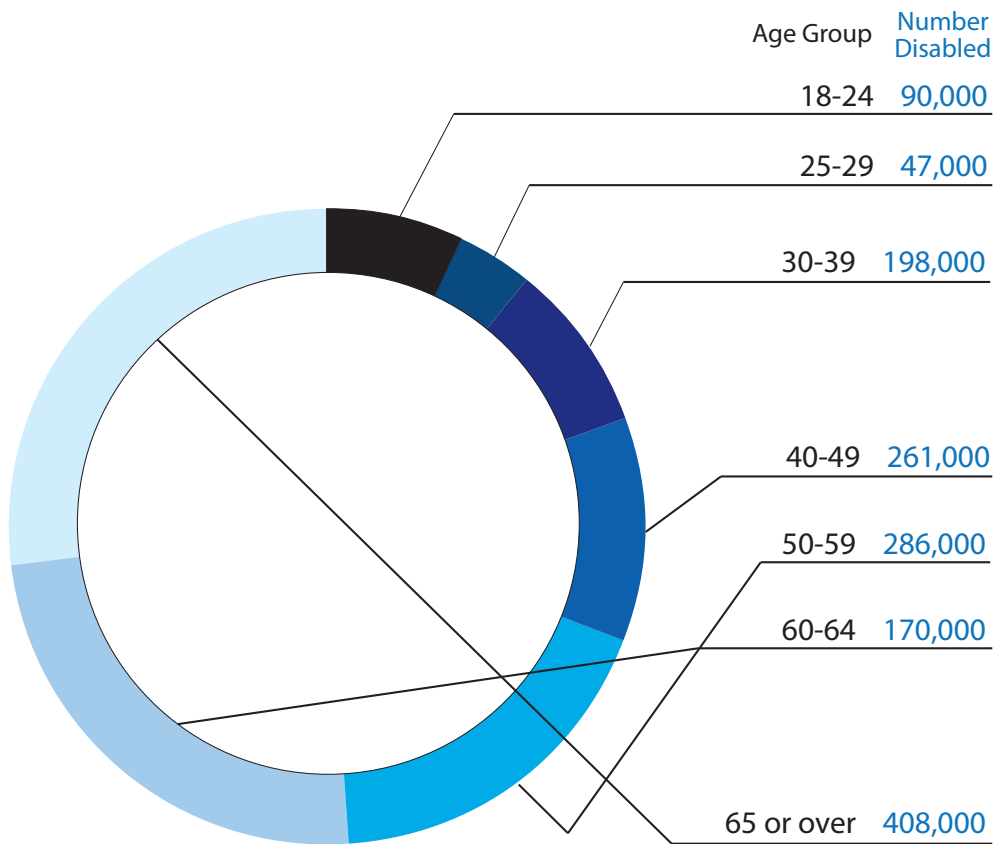
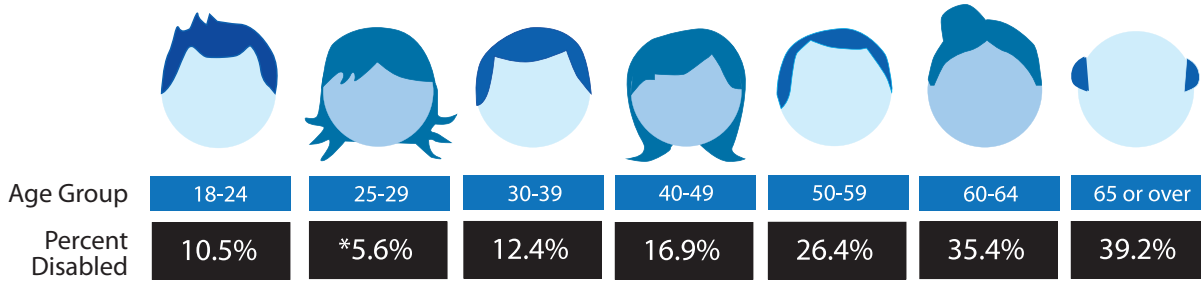
<sup>4</sup> Los Angeles County Department of Public Health, Office of Health Assessment and Epidemiology, "2007 Los Angeles County Health Survey," 2007.

<sup>5</sup> Los Angeles County Department of Public Health, "Adult Disability in Los Angeles County," L.A. Health, 2006.



## Los Angeles County Disability Status in Adults (18+ Years Old)<sup>6</sup>

Age Group Percent Estimate Number



\*This estimate is statistically unstable (relative standard error greater than or equal to 23%) and therefore may not be appropriate to use for planning or policy purposes.

<sup>6</sup> Los Angeles County Department of Public Health, Office of Health Assessment and Epidemiology, "2007 Los Angeles County Health Survey," 2007.



## Federal and State Requirements







Federal and California state laws mandate that Counties make the voting process accessible to people with disabilities, including polling locations and voting machines. These provisions are found in the Voting Accessibility for the Elderly and Handicapped Act, Americans with Disabilities Act, Voting Rights Act, Help America Vote Act, and in multiple sections of the California Elections Code. The laws were enacted in order to remove voting barriers, prevent election discrimination against people with disabilities, and provide all citizens with the opportunity to be a part of the democratic process. Making polling locations and voting procedures accessible for all voters ensures a citizen's right to cast an accurate ballot.

## FEDERAL ACCESSIBILITY REQUIREMENTS

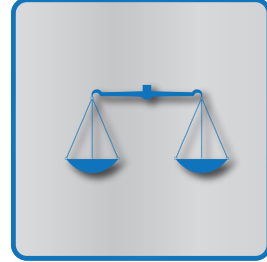
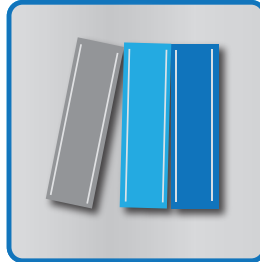
**Voting Accessibility for the Elderly and Handicapped Act of 1984 (VAEHA)** – This Act requires polling places used in federal elections to be accessible to disabled and elderly voters. If an elderly voter or voter with a disability is assigned to an inaccessible polling location, that person must be assigned to another site that is accessible or be provided with an alternative means for casting a ballot on Election Day. In addition, the Act mandates that States provide voting aids for the elderly and disabled, including information with large type and hearing devices for the deaf.

**Americans with Disabilities Act of 1990 (ADA)** – This Act specifically prohibits a public entity from discriminating against a qualified individual with a disability. In addition, the Act requires public entities to provide program access, reasonable modification of policy, and auxiliary aids and services so that individuals with a disability are given an equal opportunity to participate in and enjoy the benefits of service, program, or activity conducted by a public entity, including the right to vote.

**Voting Rights Act of 1965 (VRA)** – Section 208 requires that any individual who is blind, disabled, or unable to read or write, be allowed to have assistance by a person the voter chooses other than the voter's employer, agent of the employer, or agent of the union from which the voter is a member.

**Help America Vote Act of 2002 (HAVA)** – This Act includes provisions requiring accessible voting technologies in polling places.

- **Section 301(a)(3)(A)** – Voting systems shall be “accessible for individuals with disabilities, including non-visual accessibility for the blind and visually impaired, in a manner that provides the same opportunity for access and participation as for other voters.”
- **Section 301(a)(3)(B)** – Allows states to satisfy the above requirement by using a “direct recording electronic voting system” at each polling place.



## STATE REQUIREMENTS

**Elections Code § 12280** – This code requires polling places to be accessible to the physically handicapped.

**Elections Code § 19250** – The code requires that the voter-verified paper audit trail be accessible to all including the disabled. This may be through an audio component.

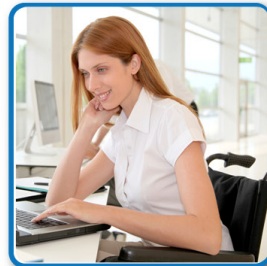
**Elections Code § 14282** – (a) A voter who is unable to mark a ballot on his/her own will receive assistance by a person selected by the voter, other than the voter's employer, agent of the voter's employer, or an officer or agent of the union of which the voter is a member. (c) When a polling place is inaccessible to the physically handicapped, a voter may request to vote outside the site in a place as near as possible to the polling place. In those places where it is impractical to vote a regular ballot outside the polling place, vote by mail ballots will be provided and should be voted and returned in the same manner as the regular ballot.

**Elections Code § 13304** – The notice of polling place location that is mailed to the voter may inform the voter if the site is accessible or not to the physically handicapped.

**Elections Code § 19227** – (a) The Secretary of State will adopt rules and regulations governing any voting technology that provides blind and visually impaired voters with access that is equivalent to that provided to sighted individuals, including the ability to cast and verify votes made by visual and nonvisual means. (b) There must be at least one voting system, approved by the Secretary of State, that provides access to voters who are blind or visually impaired.



# Accessibility Tools





## Los Angeles County Registrar-Recorder/County Clerk

The ABB (Audio Ballot Booth) is a voting machine for voters who are blind, visually impaired or otherwise disabled that uses an audio headset and a simple tactile keypad to make ballot choices. Once voting is complete, a paper ballot is printed, which can then be inserted into the InkaVote Plus precinct ballot reader (PBR).





Wheelchair accessible voting booths that have wide leg extensions and a low height, are available at every polling place for those voters who are unable to stand while marking the ballot.





Any voter who cannot physically go into the polling place may request to vote at the curbside. When requested, a pollworker will bring the ballot and voting device outside to the voter. People can ask for this service by calling the number on the curbside voting sign that is placed outside of every polling location. In addition, at certain inaccessible locations, voters can communicate their need for curbside assistance by pushing a BallotCall button that wirelessly alerts a poll worker inside the building.



 <b>Curbside voting</b>		
場外投票;街頭投票	कर्वसाइड पर मतदान	路邊投票
การลงคะแนนแบบขึ้นตามสำหรับบุคคลพิการ	가두 투표	Votación en la Acera Disponible
Magagawa and Pagboto sa Gilid ng Bangketa	ကပ်ဘေးပေးပွဲတိုက်ပေးမှု, ကပ်ဘေးပေးပွဲခန်းမ	bỏ phiếu ở ngoài phòng phiếu
		<b>(562) 519-7990</b>

Rubber floor mats can be used to cover a doorsill or threshold and create a smooth passage for someone in a wheelchair.





## Los Angeles County Registrar-Recorder/County Clerk

Ramps can be set up in front of polling places where the entrance is located so that a voter in a wheelchair can easily enter a polling place.



A large access mat can be rolled out over uneven pathways to polling entrances in order to create a stable and smooth surface that is safe for wheelchairs and walkers.





## Los Angeles County Registrar-Recorder/County Clerk

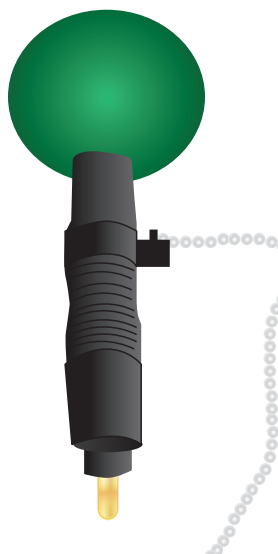
A generic handheld magnifier that can be used to enlarge the ballot's font is provided at every polling place.



A black "20/20" felt tip pen is offered at polling places and can be used in place of the InkaVote marker for those with limited mobility or low vision.

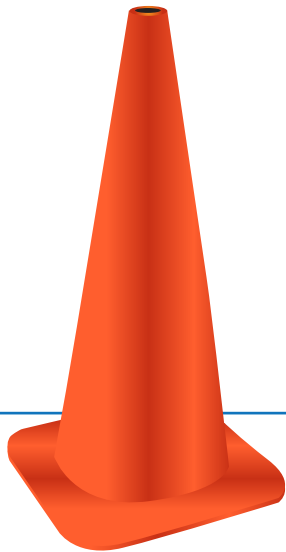


A large dexterity ball that attaches to the top of the vote recorder marker is available at every polling place for those who are unable to easily grasp the stylus.

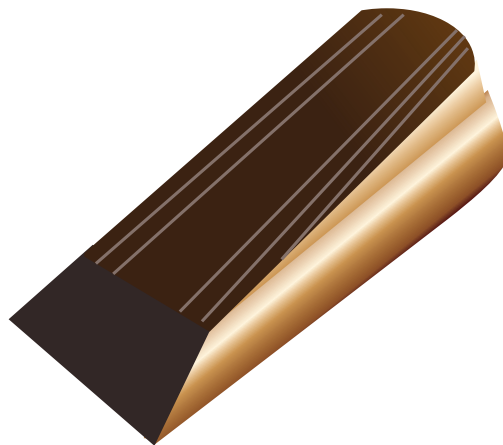




Six-foot (6') disabled parking stanchion signs, as well as 18' and 28' disabled signs with access aisle cones, are used to modify parking places, making them available for people with disabilities.



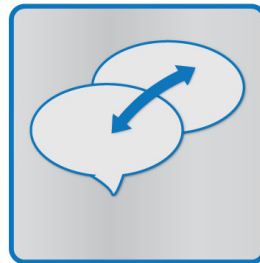
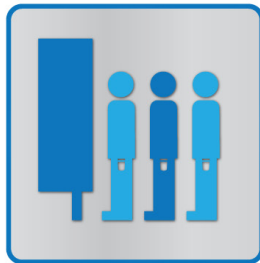
Door stops are provided to polling places to hold doors open for people who cannot physically open it themselves.





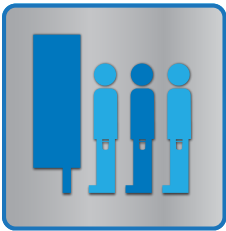


# Services





The Department provides a variety of accessibility services for people with specific needs. From voting devices to community outreach, the Department focuses on serving the greatest number of people with disabilities and ensuring that every voter has the option to vote independently and privately. The Department continues to make accessibility a priority and seeks to improve upon its services in order to create a successful voting experience for all.



### Polling Place Accessibility

The Department's Pollworker Services Section employs Field Representatives whose job is to survey and recruit the County's numerous polling places using an Accessibility Survey. These representatives look for issues including terrain, steps, locked gates, designated handicapped parking, curb cuts, necessary ramps, and maneuverable thresholds. There are around 6,000 polling locations in the Department's database that have been surveyed to ensure accessibility for people with disabilities. If a location is inaccessible, the Department's field representatives try to make it accessible by using modification tools, like ramps and mats. In the November 2012 election, the Department modified 82 polling sites, making 4,576 polling places accessible to people with wheelchairs.

If you can't access the polling place, request curbside voting or find an alternative accessible location at [www.lavote.net](http://www.lavote.net)

A video on the Department's polling place accessibility services can be found at [www.lavote.net](http://www.lavote.net)

Once accessibility determinations are made, polling place notifications are then sent out to all voters indicating where their polling site is located and whether it is accessible. If the location is not accessible, the voter may vote at the or find a nearby accessible poll by calling the Department or visiting our website's Accessibility Services section. Below are additional services the Department offers to make the voting process comfortable for all voters.

### Accessible Voting Machines

- The ABB which offers audio recordings of the ballot in 10 different languages, provides an independent and private voting experience for people with disabilities. This machine offers audio voting assistance to the visually impaired and language minority voters through the use of an audio headset and a tactile keypad. Once voting is complete, the ABB prints out a paper ballot, that is then inserted into the InkaVote Plus PBR, just like any other ballot.

### Accessible Voting Devices

- The Department provides wheelchair accessible voting booths in every polling place for those voters who are unable to stand while marking the ballot. This booth has wide leg extensions and a lower height so voters can access the ballot machine without any obstruction.
- A generic magnifying device that can be used to enhance the ballot's font is provided at every polling place to those with low vision.



## Los Angeles County Registrar-Recorder/County Clerk

- An easy grip dexterity ball that attaches to the vote recorder marker is available at every polling place. This ball allows those who have difficulty grasping the stylus to more easily hold the device in order to mark the ballot accurately.
- For people with low vision or who cannot easily hold the ballot marking device, the Department also offers a black “20/20” felt tip pen that can be used in place of the InkaVote marker.

### **Voter Assistance**

- Under California law, any voter who needs help in casting a ballot is entitled to request assistance. The Department provides pollworkers who can assist people with disabilities in marking their ballots at every polling site. Voters are also allowed up to two people, of his or her own choosing, to help in casting a ballot.
- Any voter who cannot physically go into the polling place because of architectural barriers or physical limitations may request to vote at the curbside. A pollworker will bring the ballot and voting device outside to the voter and then place the voter’s completed ballot in the ballot box. The Department also owns 12 “BallotCall” alert systems that signals a pollworker, through the use of a bell, of a voter outside who needs assistance. These systems can be mounted on a flat surface or on a base and are placed outside of locations that cannot be easily reached by a wheelchair.

### **Accessible Parking**

- When surveying polling locations, Field Representatives evaluate the number of regular and disabled parking spots available near the poll entrance. If there are no disabled spots, the Department may erect signage designating certain non-disabled spots as disabled parking. In order to modify parking places to make them accessible for people with disabilities, the Department owns 6’ disabled parking stanchion signs, as well as 18’ and 28’ disabled signs with access aisle cones.

### **Entrances**

- For locations that have steps or an entrance that is inaccessible for wheelchairs, the Department owns ramps that can be set up at a limited number of locations to make them accessible for all voters.
- Rubber floor mats are available to cover a doorsill in order to create a smooth passage for someone in a wheelchair.
- Door stops are also provided to polling places in order to keep doors open for people who cannot physically open it themselves.
- For locations that have a pathway to the entrance with an uneven surface, the Department will provide a large access pathway mat that can be rolled out to create a stable and smooth surface that is safe for wheelchairs and walkers.
- Portable lights are provided to those sites with minimum outside lighting.



The California Secretary of State's Polling Place Accessibility checklist can be viewed at <http://www.sos.ca.gov/elections/polling-place-accessibility/accessibility-checklist.htm>

### Review of Accessibility Surveys

- An in-depth and complex accessibility checklist was developed by the California Secretary of State's Office and the California State Department of Disability. To comply with state requirements, our Department adopted this checklist to use when surveying potential election poll locations and resurveying current problematic sites. Our Department's Field Representatives were trained by the Department of Disability on how to use the list and are responsible for assessing a location, documenting its specifications, and recommending temporary modifications for those inaccessible locations. The results of the survey help in creating the list of accessible poll sites, determining the number of additional election equipment needed, and finding nearby alternate accessible sites for those inaccessible locations.



The Department's website is [www.lavote.net](http://www.lavote.net)

### Accessible Website

The Department's website is currently being updated and the new version will be available in the near future. This updated site will comply with the guidelines set forth by the World Wide Web Consortium (W3C). The W3C's Web Content Accessibility Guidelines (WCAG) provides standards to follow in order to make web content accessible to people with disabilities. Therefore, the Department's new website will include tags for images, labels for non-text content, closed captions for videos, keyboard accessibility, and the ability to change font sizes. This new site will thus, make it easier for people with disabilities to access the website comfortably.

The Department's website also provides pertinent election information to users with specific needs, including a list of accessible poll sites and registration options. In addition to offering downloadable Vote By Mail applications, residents can also submit a Vote By Mail application online through the Department's website or connect to the Secretary of State's website in order to submit a voter registration form online.

The "Accessibility Services" section on the Department's website contains:

- Instructions for assisted registration
- Online voter feedback form regarding poll site accessibility
- Accessible voting options
- Election guide for voters with specific needs
- Videos on voting accessibility



## Accessible Voting Materials

### Vote By Mail

People with disabilities who are unable to vote at the poll can request a Vote by Mail ballot. Applications for the three different Vote by Mail ballots are available to download and print through the Department's website. Vote by Mail ballots must be received by the Department or a polling place no later than the close of polls on Election Day. If a voter is disabled or unable to return the ballot on his/her own, that person may designate a family member or a person residing in the same household to return the ballot. Below are descriptions of the three Vote by Mail ballots accessible to all voters:

To download or submit a Vote by Mail application, go to [http://lavote.net/VOTER/Absentee\\_Voting.cfm](http://lavote.net/VOTER/Absentee_Voting.cfm)

- **Vote by Mail** - Any registered voter who knows he/she will be unable to vote in person on Election Day can apply for a Vote by Mail ballot. These applications must be submitted for each election and received by the Department no later than 7 days before Election Day.
- **Permanent Vote by Mail** - Under state law, any voter may apply for permanent Vote by Mail status, which means a ballot will be automatically mailed to that voter for every eligible election. A voter can retain permanent absentee voter status as long as he/she continues to vote in elections. However, a voter will be removed from this list if he/she fails to return a vote by mail ballot for two consecutive statewide general elections. There are currently 1,409,153 (as of June 2013) Permanent Vote by Mail voters in the County.
- **Emergency Vote By Mail** - If a voter decides, within six days before an election, that he/she is unable to vote at the polls due to an unforeseen issue (i.e. sick, hospitalized, unplanned trip), the voter can vote with an Emergency Vote by Mail ballot. However, these ballots cannot be issued by mail and therefore, the voter or the voter's authorized representative must provide a written request in person to the Department.

Voters can download and print documents in large font at [www.lavote.net](http://www.lavote.net)

### Election Information in Large Font

The following large print documents, in 18 point bold font, are available for low vision voters:

- Permanent Vote by Mail applications
- Translated Election Materials Request forms
- Voter Bill of Rights
- Provisionial Voting flyer
- Voter Registration flyer
- Ready to Vote flyer



To request an audio sample ballot, contact Julia Keh at [jkeh@rrcc.lacounty.gov](mailto:jkeh@rrcc.lacounty.gov)

### Audio Sample Ballot

The sample ballot booklet is available in audio form on cassette tape and CD during major elections. The recordings, which can be obtained from the Department about four weeks before an election, contain election information, including local measures and candidate statements.

### Online Voter Registration

A resident can register to vote online through the California Secretary of State's website.



To learn more about becoming a pollworker, go to [www.lavote.net](http://www.lavote.net)

### Disability Awareness Training for Pollworkers

The two-hour pollworker training classes cover topics including provisional voting, opening and closing of polls, supplies provided to assist voters with disabilities, curbside voting procedures, and completing the Assisted Voter's List. During the classes, instructors also address cultural sensitivity for people with disabilities and minority language speakers. In addition, instructors devote a portion of the training to the ABB, including the set up and use of the machine, what to do if it stops working, and the importance of offering the ABB for anyone that may need assistance.

Pollworker trainings take place 3-5 weeks before an election, depending on the size of the election, and are coordinated by the Department's Pollworker Training Section. Pollworkers receive a \$25 stipend for attending a class and, although not required, trainings are highly recommended for clerks. In a major election, the Department provides over 490 classes throughout the County for the more than 26,000 pollworkers.

Instructions on assisting voters with disabilities are specifically discussed within a training video, a presentation and on the training manual's last page entitled "Working with Voters with Specific Needs." In 2009, the Department's Voters with Specific Needs Sensitivity Training Video won an Achievement Award from the National Association of Counties. This video, which was a collaborative effort between the Department and several community organizations, contains vignettes in 5, 10, and 25 minute lengths. During the video, non-actors and community activists act out real scenarios about assisting voters with various specific needs including low vision, hearing impaired, wheelchair users, and people who are limited English proficient. The video provides all of the necessary tools to educate pollworkers on providing excellent customer service and to effectively communicate with diverse populations.



## Voter Outreach and Education

To request assistance or Department attendance at a community event, email [outreach@rrcc.lacounty.gov](mailto:outreach@rrcc.lacounty.gov)

The Department's Community and Voter Outreach section participates in various activities that seek to educate, inform, and increase voter participation throughout the County. Outreach activities include making presentations to community groups, disseminating information at local events, assisting residents in registering and completing applications, attending community meetings, and conducting voting equipment demonstrations. The Department usually attends around six events per month during a non-election period and 15 events per week during a major election.

While conducting outreach, staff members can provide low vision voters with the Department's large font material and the use of technology that can assist in viewing additional election information. The Department recently purchased video magnification devices and transformers to take to outreach events. These devices can increase the font size and change the font and background colors of documents, helping voters view election materials and sign registration forms with ease.

Additionally, the Department partners with several rehabilitation centers, senior groups, and community organizations in order to reach specific needs communities and educate them about the services the Department offers for people with disabilities. Some of the organizations that have a close relationship with the Department include United Cerebral Palsy, the Braille Institute, AARP, and Southern California Rehabilitation Services.



## Voting Accessibility Advisory Committee

The Secretary of State recommends that each county elections official appoint and maintain a Voting Accessibility Advisory Committee (VAAC) to advise and assist the official in ensuring that the provisions of the VAEHA are implemented. The County's VAAC was established in 2006 to assist the Department in implementing innovative strategies that improve accessibility and participation in the election process for individuals within the full spectrum of disabilities. The VAAC, which consists of up to 15 people from various disability organizations, meets every other month at the Department's office in Norwalk.

If you or your organization would like to be involved in the VAAC committee, please contact Julia Keh at [jkeh@rrcc.lacounty.gov](mailto:jkeh@rrcc.lacounty.gov)

The roles and responsibilities of the VAAC members are:

- Hold VAAC meetings every other month.
- Provide advice to overcome polling place accessibility barriers.
- Make recommendations for the department's website and educational materials relative to accessibility.
- Assist in surveying polling place accessibility.
- Make recommendations related to pollworker training materials and class content.
- Make recommendations on conducting outreach to the disability community.

See Appendix I (page 28) for more information.



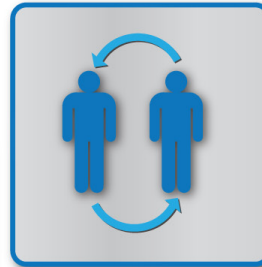
## TDD

The Department uses a Telecommunications Device for the Deaf (TDD) to communicate with people who are hearing impaired. This system uses a text communication device that sends messages over a telephone line. The TDD number is (562) 462-2259.





# Challenges





## **Aging Voting System**

While the current InkaVote Plus system continues to function with accuracy, the design of the system and age of the technology does not offer the flexibility necessary to continue to accommodate the growing electorate and the needed innovations to improve voting accessibility. In addition, the current ballot system is difficult to use for people with limited mobility and the ABB can be confusing to set up for some poll workers.

## **Access to Adequate Facilities for Polling Places**

During each election cycle, there are changes in polling place locations due to cancellations. Owners decide that they do not wish to offer their property as a polling location anymore and a majority of these cancellations occur in the last few months before an election. Election officials then have to work quickly to find another accessible location. Many times, there is insufficient time to locate an accessible site and the Department must settle for an inaccessible location.

Additionally, a number of schools turn down offers to be a polling place location or cancel before an election due to overcrowded classrooms, previously scheduled activities, or a fear of outside people on campus during school hours. Many schools are also in “lock-down” mode to prevent access to school grounds by unwanted visitors and because of this, voters with disabilities are prevented from entering through locked but otherwise accessible entrances to the polling place.

## **Differing Standards**

ADA standards and California building codes differ in many respects when it comes to accessibility, making it challenging for the Department to comply. Many times, a ramp or the slope of a parking lot may meet building code standards but not the standards put forth in the ADA. These inconsistencies, therefore, lead to a complicated and confusing process when looking for accessible polling sites.

## **Limited Data**

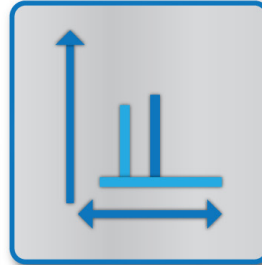
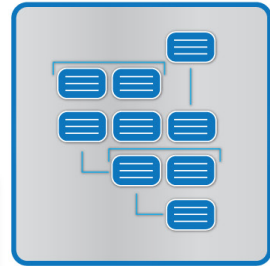
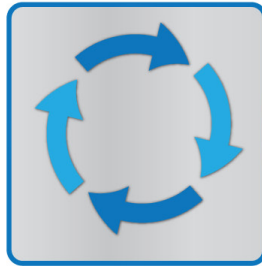
Demographic data on people with disabilities in Los Angeles County is very limited and thus, identifying precincts that contain voters with specific needs can be difficult. There is also even less data on the types and degrees of disabilities that people may have. Since it is difficult to target specific areas of need, the Department is challenged in focusing outreach efforts in the community and as a result, may not be reaching the greatest number of voters.

## **Funding for New Technology**

Due to the size of the County and the number of voting precincts, the cost of buying new voting system technology is extremely high. Purchasing a new system for over 4,500 polling locations will take a large amount of government funding. Additionally, funds administered through HAVA cannot be used for the research and development stage of a project to deploy a new compliant voting system. Therefore, finding the money to support this project is a challenging task for the Department.



# Department Goals





## Los Angeles County Registrar-Recorder/County Clerk

A core principle of the Department's mission is to provide accessible elections for all voters. In pursuit of this mission, one of our goals is to provide voters with varying degrees of disabilities with the best available option to cast their vote privately and independently.

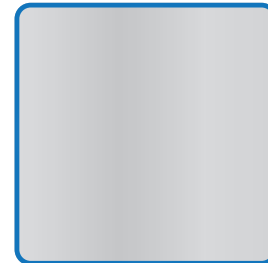
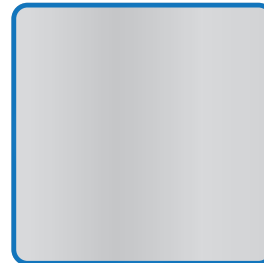
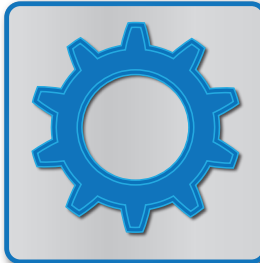
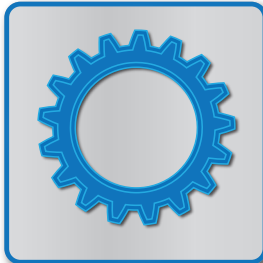
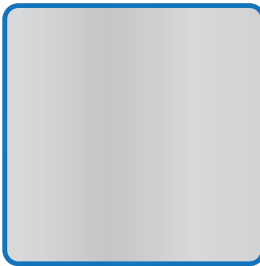
We strive to accomplish this goal by:

- Surveying all polling place locations to ensure accessibility on Election Day.
- Training pollworkers on how to assist voters with disabilities.
- Developing partnerships with community and advocacy organizations serving people with disabilities.
- Maintaining and upgrading our voting systems to provide the highest level of access possible.
- Providing accessible election information and materials.





# Measurements





## Los Angeles County Registrar-Recorder/County Clerk

The Department is committed to evaluating the quality of our work and progress in reaching our goals. We seek to achieve the highest standard of service by proactively investing in practices that go above and beyond compliance with federal and state regulations. Therefore, our office will conduct an internal audit of this process every year in order to assess our accomplishments and ways to improve.





## Appendix I

### **Voting Accessibility Advisory Committee**

The Voting Accessibility Advisory Committee was established in 2006 to assist the Registrar-Recorder/County Clerk, our department, in implementing innovative strategies and improving accessibility and participation in the election process for individuals within the full spectrum of disabilities.

The roles and responsibilities of the Voting Accessibility Advisory Committee are to:

- Hold VAAC meetings every other month.
- Provide advice to overcome polling place accessibility barriers.
- Make recommendations for the department's website and educational materials relative to accessibility.
- Assist in surveying polling place accessibility.
- Make recommendations related to pollworker training materials and class content.
- Make recommendations on conducting outreach to the disability community.

Current VAAC membership (representatives from the following organizations):

- California Council of the Blind
- California Individual Living Center
- City of Whittier
- Department of Disability, City of Los Angeles
- Disability Rights California
- Disabled Resources Center Inc.
- Los Angeles County, CEO Office
- State of CA, Dept. of Rehabilitation
- United Cerebral Palsy
- USC The Center for Disability Studies and Community Inclusion
- Westside Center for Independent Living



## Appendix II

### Website Accessibility Evaluation

#### Evaluating Website Accessibility

WEB CONTENT ACCESSIBILITY GUIDELINES (W3C's WCAG)

<http://www.w3.org/WAI/WCAG20/quickref/>

<http://accessibility.psu.edu/wcag2>

#### Standards

**1.1 Text Alternatives:** Provide text alternatives for any non-text content so that it can be changed into other forms people need, such as large print, braille, speech, symbols or simpler language.

Standard	Follow?	Comments
<b>1.1.1 Non-text Content:</b> All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, except for the situations listed below (Level A).	Yes	All buttons are labeled and images have ALT tags.
<b>Controls, Input:</b> If non-text content is a control or accepts user input, then it has a name that describes its purpose.	Yes	
<b>Time-Based Media:</b> If non-text content is time-based media, then text alternatives at least provide descriptive identification of the non-text content.	Yes	
<b>Test:</b> If non-text content is a test or exercise that would be invalid if presented in text, then text alternatives at least provide descriptive identification of the non-text content.	N/A	
<b>Sensory:</b> If non-text content is primarily intended to create a specific sensory experience, then text alternatives at least provide descriptive identification of the non-text content.	Yes	





Standard	Follow?	Comments
<p><b>CAPTCHA:</b> If the purpose of non-text content is to confirm that content is being accessed by a person rather than a computer, then text alternatives that identify and describe the purpose of the non-text content are provided, and alternative forms of CAPTCHA using output modes for different types of sensory perception are provided to accommodate different disabilities.</p>	N/A	Traditional CAPTCHA in place due to security issue RRCC had in Spring 2012. Need to discuss alternatives in Phase 3.
<p><b>Decoration, Formatting, Invisible:</b> If non-text content is pure decoration, is used only for visual formatting, or is not presented to users, then it is implemented in a way that it can be ignored by assistive technology.</p>	Yes	

**1.2 Time-based Media:** Provide alternatives for time-based media.

Standard	Follow?	Comments
<p><b>1.2.1 Audio-only and Video-only (Prerecorded):</b> For prerecorded audio-only and prerecorded video-only media, the following are true, except when the audio or video is a media alternative for text and is clearly labeled as such (Level A):</p> <ul style="list-style-type: none"> <li>• <b>Prerecorded Audio-only:</b> An alternative for time-based media is provided that presents equivalent information for prerecorded audio-only content.</li> <li>• <b>Prerecorded Video-only:</b> Either an alternative for time-based media or an audio track is provided that presents equivalent information for prerecorded video-only content.</li> </ul>	In Progress	Only applies to pre-recorded video: Will provide audio descriptions of what is happening in the videos in Phase 3 or later.
<p><b>1.2.2 Captions (Prerecorded):</b> Captions are provided for all prerecorded audio content in synchronized media, except when the media is a media alternative for text and is clearly labeled as such (Level A).</p>	Yes	Only applicable to Youtube videos, which have a closed caption option, that may be embedded on the site. Using the Youtube application to convert to languages as well.



Standard	Follow?	Comments
<b>1.2.3 Audio Description or Media Alternative (Prerecorded):</b> An alternative for time-based media or audio description of the prerecorded video content is provided for synchronized media, except when the media is a media alternative for text and is clearly labeled as such (Level A).	In Progress	Will provide audio descriptions of what is happening in the videos in Phase 3 or later.
<b>1.2.4 Captions (Live):</b> Captions are provided for all live audio content in synchronized media (Level AA).	No	VSAP meetings use LiveStream, which doesn't provide CC options.
<b>1.2.5 Audio Description (Prerecorded):</b> Audio description is provided for all prerecorded video content in synchronized media (Level AA).	In Progress	Will provide audio descriptions of what is happening in the videos in Phase 3 or later.
<b>1.2.6 Sign Language (Prerecorded):</b> Sign language interpretation is provided for all prerecorded audio content in synchronized media (Level AAA).	No	
<b>1.2.7 Extended Audio Description (Prerecorded):</b> Where pauses in foreground audio are insufficient to allow audio descriptions to convey the sense of the video, extended audio description is provided for all prerecorded video content in synchronized media (Level AAA).	In Progress	Will provide audio descriptions of what is happening in the videos in Phase 3 or later.
<b>1.2.8 Media Alternative (Prerecorded):</b> An alternative for time-based media is provided for all prerecorded synchronized media and for all prerecorded video-only media (Level AAA).	No	
<b>1.2.9 Audio-only (Live):</b> An alternative for time-based media that presents equivalent information for live audio-only content is provided (Level AAA).	No	

**1.3 Adaptable:** Create content that can be presented in different ways (for example simpler layout) without losing information or structure.

Standard	Follow?	Comments
<b>1.3.1 Info and Relationships:</b> Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text (Level A).	Yes	Site has table headers. Section colors and links are colored.



**1.3 Adaptable:** Create content that can be presented in different ways (for example simpler layout) without losing information or structure.

Standard	Follow?	Comments
<b>1.3.2 Meaningful Sequence:</b> When the sequence in which content is presented affects its meaning, a correct reading sequence can be programmatically determined (Level A).	Yes	
<b>1.3.3 Sensory Characteristics:</b> Instructions provided for understanding and operating content do not rely solely on sensory characteristics of components such as shape, size, visual location, orientation, or sound (Level A).	Yes	Buttons are labeled.

**1.4 Distinguishable:** Make it easier for users to see and hear content including separating foreground from background.

Standard	Follow?	Comments
<b>1.4.1 Use of Color:</b> Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element (Level A).	Yes	
<b>1.4.2 Audio Control:</b> If any audio on a Web page plays automatically for more than 3 seconds, either a mechanism is available to pause or stop the audio, or a mechanism is available to control audio volume independently from the overall system volume level (Level A).	N/A	
<b>1.4.3 Contrast (Minimum):</b> The visual presentation of text and images of text has a contrast ratio of at least 4.5:1, except for the following (Level AA): <ul style="list-style-type: none"> <li>• <b>Large Text:</b> Large-scale text and images of large-scale text have a contrast ratio of at least 3:1;</li> <li>• <b>Incidental:</b> Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement.</li> <li>• <b>Logotypes:</b> Text that is part of a logo or brand name has no minimum contrast requirement.</li> </ul>	Yes	



Standard	Follow?	Comments
<p><b>1.4.4 Resize text:</b> Except for captions and images of text, text can be resized without assistive technology up to 200 percent without loss of content or functionality (Level AA).</p>	Yes	
<p><b>1.4.5 Images of Text:</b> If the technologies being used can achieve the visual presentation, text is used to convey information rather than images of text except for the following: (Level AA)</p> <ul style="list-style-type: none"> <li>• <b>Customizable:</b> The image of text can be visually customized to the user’s requirements;</li> <li>• <b>Essential:</b> A particular presentation of text is essential to the information being conveyed. Note: Logotypes (text that is part of a logo or brand name) are considered essential.</li> </ul>	No	
<p><b>1.4.6 Contrast (Enhanced):</b> The visual presentation of text and images of text has a contrast ratio of at least 7:1, except for the following (Level AAA):</p> <ul style="list-style-type: none"> <li>• <b>Large Text:</b> Large-scale text and images of large-scale text have a contrast ratio of at least 4.5:1;</li> <li>• <b>Incidental:</b> Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement.</li> <li>• <b>Logotypes:</b> Text that is part of a logo or brand name has no minimum contrast requirement.</li> </ul>	Yes	
<p><b>1.4.7 Low or No Background Audio:</b> For prerecorded audio-only content that (1) contains primarily speech in the foreground, (2) is not an audio CAPTCHA or audio logo, and (3) is not vocalization intended to be primarily musical expression such as singing or rapping, at least one of the following is true (Level AAA):</p> <ul style="list-style-type: none"> <li>• <b>No Background:</b> The audio does not contain background sounds.</li> <li>• <b>Turn Off:</b> The background sounds can be turned off.</li> <li>• <b>20 dB:</b> The background sounds are at least 20 decibels lower than the foreground speech content, with the exception of occasional sounds that last for only one or two seconds.</li> </ul> <p>Note: Per the definition of “decibel,” background sound that meets this requirement will be approximately four times quieter than the foreground speech content.</p>	N/A	



Standard	Follow?	Comments
<p><b>1.4.8 Visual Presentation:</b> For the visual presentation of blocks of text, a mechanism is available to achieve the following (Level AAA):</p> <ol style="list-style-type: none"> <li>1. Foreground and background colors can be selected by the user.</li> <li>2. Width is no more than 80 characters or glyphs (40 if CJK). Text is not justified (aligned to both the left and the right margins).</li> <li>3. Line spacing (leading) is at least space-and-a-half within paragraphs, and paragraph spacing is at least 1.5 times larger than the line spacing.</li> <li>4. Text can be resized without assistive technology up to 200 percent in a way that does not require the user to scroll horizontally to read a line of text on a full-screen window.</li> </ol>	<p>No</p> <ol style="list-style-type: none"> <li>1. No</li> <li>2. No</li> <li>3. No</li> <li>4. Yes</li> </ol>	
<p><b>1.4.9 Images of Text (No Exception):</b> Images of text are only used for pure decoration or where a particular presentation of text is essential to the information being conveyed (Level AAA). Note: Logotypes (text that is part of a logo or brand name) are considered essential.</p>	<p>N/A</p>	

**2.1 Keyboard Accessible:** Make all functionality available from a keyboard.

Standard	Follow?	Comments
<p><b>2.1.1 Keyboard:</b> All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes, except where the underlying function requires input that depends on the path of the user’s movement and not just the endpoints (Level A).</p> <ul style="list-style-type: none"> <li>• <b>Note 1:</b> This exception relates to the underlying function, not the input technique. For example, if using handwriting to enter text, the input technique (handwriting) requires path-dependent input but the underlying function (text input) does not.</li> <li>• <b>Note 2:</b> This does not forbid and should not discourage providing mouse input or other input methods in addition to keyboard.</li> </ul>	<p>Yes</p>	



Standard	Follow?	Comments
<p><b>2.1.2 No Keyboard Trap:</b> If keyboard focus can be moved to a component of the page using a keyboard interface, then focus can be moved away from that component using only a keyboard interface, and, if it requires more than unmodified arrow or tab keys or other standard exit methods, the user is advised of the method for moving focus away (Level A).</p>	N/A	
<p><b>2.1.3 Keyboard (No Exception):</b> All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes (Level AAA).</p>	Yes	

**2.2 Enough Time:** Provide users enough time to read and use content.

Standard	Follow?	Comments
<p><b>2.2.1 Timing Adjustable:</b> For each time limit that is set by the content, at least one of the following is true (Level A):</p> <ul style="list-style-type: none"> <li>• Turn off: The user is allowed to turn off the time limit before encountering it; or</li> <li>• Adjust: The user is allowed to adjust the time limit before encountering it over a wide range that is at least ten times the length of the default setting; or</li> <li>• Extend: The user is warned before time expires and given at least 20 seconds to extend the time limit with a simple action (for example, “press the space bar”), and the user is allowed to extend the time limit at least ten times; or</li> <li>• Real-time Exception: The time limit is a required part of a real-time event (for example, an auction), and no alternative to the time limit is possible; or</li> <li>• Essential Exception: The time limit is essential and extending it would invalidate the activity; or</li> <li>• 20 Hour Exception: The time limit is longer than 20 hours.</li> </ul>	N/A	



Standard	Follow?	Comments
<p><b>2.2.2 Pause, Stop, Hide: For moving, blinking, scrolling, or auto-updating information, all of the following are true</b> (Level A):</p> <ul style="list-style-type: none"> <li>• Moving, blinking, scrolling: For any moving, blinking or scrolling information that (1) starts automatically, (2) lasts more than five seconds, and (3) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it unless the movement, blinking, or scrolling is part of an activity where it is essential; and</li> <li>• Auto-updating: For any auto-updating information that (1) starts automatically and (2) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it or to control the frequency of the update unless the auto-updating is part of an activity where it is essential.</li> </ul>	N/A	
<p><b>2.2.3 No Timing:</b> Timing is not an essential part of the event or activity presented by the content, except for non-interactive synchronized media and real-time events (Level AAA).</p>	N/A	
<p><b>2.2.4 Interruptions:</b> Interruptions can be postponed or suppressed by the user, except interruptions involving an emergency (Level AAA).</p>	N/A	
<p><b>2.2.5 Re-authenticating:</b> When an authenticated session expires, the user can continue the activity without loss of data after re-authenticating (Level AAA).</p>	In Progress	

**2.3 Seizures:** Do not design content in a way that is known to cause seizures.

Standard	Follow?	Comments
<p><b>2.3.1 Three Flashes or Below Threshold:</b> Web pages do not contain anything that flashes more than three times in any one second period, or the flash is below the general flash and red flash thresholds (Level A).</p>	N/A	



Standard	Follow?	Comments
<b>2.3.2 Three Flashes:</b> Web pages do not contain anything that flashes more than three times in any one second period. (Level AAA)	N/A	

**2.4 Navigable:** Provide ways to help users navigate, find content, and determine where they are.

Standard	Follow?	Comments
<b>2.4.1 Bypass Blocks:</b> A mechanism is available to bypass blocks of content that are repeated on multiple Web pages. (Level A)	Yes	
<b>2.4.2 Page Titled:</b> Web pages have titles that describe topic or purpose. (Level A)	Yes	Labels for sections, content subheads and sidebars act as landmarks
<b>2.4.3 Focus Order:</b> If a Web page can be navigated sequentially and the navigation sequences affect meaning or operation, focusable components receive focus in an order that preserves meaning and operability. (Level A)	Yes	
<b>2.4.4 Link Purpose (In Context):</b> The purpose of each link can be determined from the link text alone or from the link text together with its programmatically determined link context, except where the purpose of the link would be ambiguous to users in general. (Level A)	Yes	
<b>2.4.5 Multiple Ways:</b> More than one way is available to locate a Web page within a set of Web pages except where the Web Page is the result of, or a step in, a process. (Level AA)	Yes	
<b>2.4.6 Headings and Labels:</b> Headings and labels describe topic or purpose. (Level AA)	Yes	Labels for sections, content subheads and sidebars act as landmarks
<b>2.4.7 Focus Visible:</b> Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible. (Level AA)	Yes	
<b>2.4.8 Location:</b> Information about the user's location within a set of Web pages is available. (Level AAA)	Yes	May consider a breadcrumb in the future.
<b>2.4.9 Link Purpose (Link Only):</b> A mechanism is available to allow the purpose of each link to be identified from link text alone, except where the purpose of the link would be ambiguous to users in general. (Level AAA)	Yes	Cursor visible. Hand pointer visible for link.





Standard	Follow?	Comments
<b>2.4.10 Section Headings:</b> Section headings are used to organize the content. (Level AAA)	Yes	

**3.1 Readable:** Make text content readable and understandable.

Standard	Follow?	Comments
<b>3.1.1 Language of Page:</b> The default human language of each Web page can be programmatically determined. (Level A)	Yes	
<b>3.1.2 Language of Parts:</b> The human language of each passage or phrase in the content can be programmatically determined except for proper names, technical terms, words of indeterminate language, and words or phrases that have become part of the vernacular of the immediately surrounding text. (Level AA)	In Progress	
<b>3.1.3 Unusual Words:</b> A mechanism is available for identifying specific definitions of words or phrases used in an unusual or restricted way, including idioms and jargon. (Level AAA)	In Progress	Specified words will be linked to a glossary, which will be created.
<b>3.1.4 Abbreviations:</b> A mechanism for identifying the expanded form or meaning of abbreviations is available. (Level AAA)	In Progress	Need to identify abbreviations. Some are not.
<b>3.1.5 Reading Level:</b> When text requires reading ability more advanced than the lower secondary education level after removal of proper names and titles, supplemental content, or a version that does not require reading ability more advanced than the lower secondary education level, is available. (Level AAA)	In Progress	Need alternatives for code language.
<b>3.1.6 Pronunciation:</b> A mechanism is available for identifying specific pronunciation of words where meaning of the words, in context, is ambiguous without knowing the pronunciation. (Level AAA)	No	In future will consider a speech-enabled reader.



**3.2 Predictable:** Make Web pages appear and operate in predictable ways.

Standard	Follow?	Comments
<b>3.2.1 On Focus:</b> When any component receives focus, it does not initiate a change of context. (Level A)	Yes	Cursor visible. Hand pointer visible for link.
<b>3.2.2 On Input:</b> Changing the setting of any user interface component does not automatically cause a change of context unless the user has been advised of the behavior before using the component. (Level A)	N/A	Site has set templates that don't require users to manipulate it.
<b>3.2.3 Consistent Navigation:</b> Navigational mechanisms that are repeated on multiple Web pages within a set of Web pages occur in the same relative order each time they are repeated, unless a change is initiated by the user. (Level AA)	Yes	
<b>3.2.4 Consistent Identification:</b> Components that have the same functionality within a set of Web pages are identified consistently. (Level AA)	Yes	
<b>3.2.5 Change on Request:</b> Changes of context are initiated only by user request or a mechanism is available to turn off such changes. (Level AAA)	N/A	

**3.3 Input Assistance:** Help users avoid and correct mistakes.

Standard	Follow?	Comments
<b>3.3.1 Error Identification:</b> If an input error is automatically detected, the item that is in error is identified and the error is described to the user in text. (Level A)	In Progress	Cursor visible. Hand pointer visible for link.
<b>3.3.2 Labels or Instructions:</b> Labels or instructions are provided when content requires user input. (Level A)	Yes	
<b>3.3.3 Error Suggestion:</b> If an input error is automatically detected and suggestions for correction are known, then the suggestions are provided to the user, unless it would jeopardize the security or purpose of the content. (Level AA)	Yes	



Standard	Follow?	Comments
<p><b>3.3.4 Error Prevention (Legal, Financial, Data):</b> For Web pages that cause legal commitments or financial transactions for the user to occur, that modify or delete user-controllable data in data storage systems, or that submit user test responses, at least one of the following is true: (Level AA)</p> <ol style="list-style-type: none"> <li>1. Reversible: Submissions are reversible.</li> <li>2. Checked: Data entered by the user is checked for input errors and the user is provided an opportunity to correct them.</li> <li>3. Confirmed: A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission.</li> </ol>	In Progress	Forms to be implemented in Phase 3.
<p><b>3.3.5 Help:</b> Context-sensitive help is available. (Level AAA)</p>	Yes	Located in the footer.
<p><b>3.3.6 Error Prevention (All):</b> For Web pages that require the user to submit information, at least one of the following is true: (Level AAA)</p> <ol style="list-style-type: none"> <li>1. Reversible: Submissions are reversible.</li> <li>2. Checked: Data entered by the user is checked for input errors and the user is provided an opportunity to correct them.</li> <li>3. Confirmed: A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission.</li> </ol>	In Progress	Forms to be implemented in Phase 3.

**4.1 Compatible:** Maximize compatibility with current and future user agents, including assistive technologies.

Standard	Follow?	Comments
<p><b>4.1.1 Parsing:</b> In content implemented using markup languages, elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique, except where the specifications allow these features. (Level A)</p>	Yes	Markup formatted cleanly



Standard	Follow?	Comments
<p><b>4.1.2 Name, Role, Value:</b> For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies. (Level A)</p>	Yes	Came with Sitefinity

**Conformance Levels to WCAG 2.0**

	Yes	In Progress	N/A	No	% Conformed
Level A	16 / 25	3	6	0	64%
Level AA	8 / 13	3	0	2	62%
Level AAA	6 / 23	6	6	5	26%



## SECTION 508 STANDARDS GUIDE

<https://www.section508.gov/index.cfm?fuseAction=stdsdoc#Web>

### Purpose

To implement section 508 of the Rehabilitation Act of 1973. Section 508 requires that when federal agencies develop, procure, maintain, or use electronic and information technology, members of the public and federal employees with disabilities have access to and use of information and data that is comparable to the access and use by those who are not individuals with disabilities.

### Standards

§ 1194.22 Web-based intranet and internet information and applications.

(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).

Addressed in WCAG

(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.

Addressed in WCAG

(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.

Addressed in WCAG

(d) Documents shall be organized so they are readable without requiring an associated style sheet.

Yes.

(e) Redundant text links shall be provided for each active region of a server-side image map.

Addressed in WCAG

(f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.

N/A.

(g) Row and column headers shall be identified for data tables.

Addressed in WCAG

(h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.

Yes. Addressed in WCAG



## Los Angeles County Registrar-Recorder/County Clerk

(i) Frames shall be titled with text that facilitates frame identification and navigation.

N/A. Not using frames

(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.

N/A. Addressed in WCAG.

(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.

Considered time-consuming. Will need to build and update every separate page.

(l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by assistive technology.

Need to discuss with an ADA consultant.

(m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).

N/A. No applets or plug-ins.

(n) When electronic forms are designed to be completed on-line, the form shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.

Need to discuss with an ADA consultant.

(o) A method shall be provided that permits users to skip repetitive navigation links.

Addressed in WCAG.

(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.

N/A.

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