The Right to Voter Assistance for People with Disabilities

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Introduction

The right to vote is a cornerstone of our democracy, and one of the most important rights that citizens have in our society. While most adult citizens with disabilities are eligible to vote, a significant gap persists in voter turnout rates between people with and without disabilities. In 2022, people with disabilities were 1.5 percent less likely to vote than people without disabilities even if they are registered; while this turnout gap decreased from 4.8 percent in 2018, it still means that 2 million eligible people with disabilities who were registered to vote did not do so. Addressing these gaps may require a number of advocacy steps, including ensuring that people with disabilities receive the assistance they need and to which they are entitled under federal law.

¹ L. Schur *et al.*, *Disability and Voter Turnout in the 2022 Elections*, U.S. Election Commission, July 2023.

https://smlr.rutgers.edu/sites/default/files/Documents/Centers/Program_Disability_Research/Fact_Sheet_Disability_Voter_Turnout_2022_Elections.pdf.

The types of assistance people with disabilities may need to vote successfully varies. It could include help with learning about voting procedures and timelines, becoming familiar with candidates and issues, and understanding the ballot. It could also include assistance with voting tasks such as registering, completing, and/or returning a ballot, such as transportation to the polls or a mail or drop box; reading, writing, or marking an application or ballot; or returning a mail ballot. People may need assistance from a variety of trusted sources, including family, friends, neighbors, paid attendants, and facility staff in congregate settings.

This memo explains the rights of voters with disabilities to receive needed assistance, and describes the legal landscape related to laws and litigation about those rights.

1. Do voters with disabilities need assistance to be able to vote?

Yes. Research from 2022 elections shows that 20 percent of voters with disabilities needed assistance or had difficulty voting, compared to 6 percent without disabilities. People with disabilities need assistance at higher rates than those without disabilities for both in-person (25% compared to 7%) and mail voting (14% compared to 4%). The percentage of voters with disabilities needing assistance to vote in person increased between 2020 and 2022 from 6 percent to 11 percent. Most of these inperson voters with disabilities received assistance from poll workers (65%), but over 18% received help from family members and 8% received help from others. More than 16 percent needed help but did not receive it. As for absentee voters with disabilities, 45 percent received help from family members, while 11 percent received help from someone else who lives with them, 20 percent received help from a friend or neighbor, and 14 percent received help from someone else.²

2. Are there legal protections for voters with disabilities who need assistance to vote?

² L. Schur, *et al. Disability and Voting Accessibility in the 2022 Elections*, U.S. Election Assistance Commission, July 2023.

https://smlr.rutgers.edu/sites/default/files/Documents/Centers/Program_Disability_Research/Disability_Voting_Accessibility_2022_Elections_Report.pdf.

Yes. As discussed below, federal civil rights laws protect the right of voters with disabilities to receive the assistance they need and prefer, in all parts of the voting process.

First, Section 208 of the Voting Rights Act (VRA) entitles voters who require assistance to vote because of blindness, disability, or inability to read or write, to "assistance by a person of the voter's choice," so long as the assistant is not "the voter's employer or agent of that employer or officer or agent of the voter's union." 52 U.S.C. § 10508. A recent federal court decision noted that "[t]he purpose [of Section 208] was to create a guaranteed right to the voting process that could not be narrowed or limited by state legislation." *Disability Rts. N. Carolina v. N. Carolina State Bd. of Elections*, No. 5:21-CV-361-BO, 2022 WL 2678884 *4 (E.D.N.C. July 11, 2022).

In addition, the Americans with Disabilities Act (ADA) prohibits disability discrimination in the services, programs, and activities of state and local government entities, including state and local election authorities. 42 U.S.C. § 12101 et seq.3 Title II of the ADA provides that "no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity or be subjected to discrimination by any such entity." 42 U.S.C. § 12132. Under the ADA, "public entities" include "any State or local government" and "any department, agency, special purpose district, or other instrumentality of a State or local government." 42 U.S.C. § 12131(1).4 The ADA regulations define a "qualified individual with a disability" as "an individual with a disability who, with or without reasonable modifications to rules, policies, or practices, the removal of architectural, communication, or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a public entity." 35 C.F.R. § 35.104. The ADA's application to voting is discussed next.

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³ Section 504 applies to entities that receive federal funding and generally provides the same rights and remedies as the ADA. 29 U.S.C. § 794(a). This section will refer to the ADA for brevity's sake but is largely applicable to Section 504 as well.

⁴ Under Section 504, a "program or activity" receiving federal financial assistance is defined at 29 U.S.C. § 794(b).

3. What does "voting" mean for purposes of legal protections under the Voting Rights Act Section 208 and the Americans with Disabilities Act?

The VRA defines voting broadly, encompassing "all action necessary to make a vote effective in any primary, special, or general election, including, but not limited to, registration...or other action required by law prerequisite to voting, casting a ballot, and having such ballot counted properly." 52 U.S.C. § 10310(c)(1). According to the Fifth Circuit Court of Appeals, "[t]o vote, therefore, plainly contemplates more than the mechanical act of filling out the ballot sheet. It includes steps in the voting process before entering the ballot box, 'registration,' and it includes steps in the voting process after leaving the ballot box, 'having such ballot counted properly.'" OCA-Greater Houston v. Texas, 867 F.3d 604, 614-615 (5th Cir. 2017) (quoting the Voting Rights Act, 52 U.S.C. § 10310(c)(1)); emphasis in original). "'Voting' includes the delivery of an absentee ballot to a county board of elections as an action 'necessary to make a vote effective' — an absentee ballot must be delivered in order to be counted." Democracy N. Carolina v. N. Carolina State Bd. of Elections, 476 F.Supp.3d 158, 234–35 (M.D.N.C. 2020) (quoting 52 U.S.C. § 10310(c)(1)), reconsideration denied, No. 1:20CV457, 2020 WL 6591396 (M.D.N.C. Sept. 30, 2020).

The ADA also applies to the voting process. Indeed, "[v]oting is a quintessential public activity." *Nat'l Fed'n of the Blind v. Lamone*, 813 F.3d 494, 507 (4th Cir. 2016). As the U.S. Department of Justice (USDOJ) has explained, "Title II of the ADA requires state and local governments ("public entities") to ensure that people with disabilities have a full and equal opportunity to vote. The ADA's provisions apply to all aspects of voting, including voter registration, site selection, and the casting of ballots, whether on Election Day or during an early voting process." USDOJ, The Americans with Disabilities Act and Other Federal Laws Protecting the Rights of Voters with Disabilities (USDOJ Voting Guidance) at 1.

Title II of the ADA requires states to afford people with disabilities equal opportunity to participate in public programs, services and activities,

including voting systems. See, e.g., Disabled in Action v. Board of Elections in the City of New York, 752 F.3d 189 (2d Cir. 2014). Among other protections, ADA regulations prohibit state and local governments from: denying qualified individuals an equal opportunity to participate in their programs (28 C.F.R. § 35.130(b)(1)(i)-(iv), (vii)); using eligibility criteria that screen out classes of people with disabilities unless the criteria are necessary to the program being offered (28 C.F.R. §35.130(b)(8)); and utilizing criteria or methods of administration that discriminate (28 C.F.R. § 35.130(b)(3)). Public entities also have affirmative obligations to make reasonable modifications to policies, practices and procedures that are necessary for people with disabilities to have an equal opportunity to participate in government programs. 28 C.F.R. § 35.130(b)(7).

4. Do voters with disabilities have the right to choose who assists them to vote?

Voters with disabilities have an unambiguous right to choose the individual(s) who assist them in the voting process, but impermissibly restrictive state laws remain. *See, e.g.,* GA Code §§ 21-2-381(a), 21-2-385(a), (b) (2021) (limiting who may receive and provide voter assistance).

In a recent North Carolina case brought under Section 208 of the VRA, a federal district court enjoined enforcement of state laws that: 1) prohibit voters with disabilities living in congregate settings such as clinics, hospitals, and nursing homes from relying on persons associated with those facilities for assistance with any of the steps required to vote absentee, including requesting, completing, and returning absentee ballots; and 2) limit who can assist any voter to request and return an absentee ballot to a near relative or legal guardian. *Disability Rts. N. Carolina v. N. Carolina State Bd. of Elections, supra*, 2022 WL 2678884.

This case follows another lawsuit in which a federal judge, *inter alia*, enjoined application of the state law restricting voter assistance to people in institutions as to one plaintiff who was blind and resided in a nursing home. *Democracy N. Carolina v. N. Carolina State Bd. of Elections, supra*, 476 F. Supp. 3d 158. The plaintiff's wife normally assisted him to vote, but in 2020, while COVID restrictions on visitation were in place, his wife was not permitted to help him. *Id.* at 231-232. He wanted nursing home staff to assist him to complete his absentee ballot, but state law prohibited them from doing so. *Id.* The court held that the state law denied the plaintiff "meaningful access" to the franchise, in violation of the ADA and Section 504 as applied to him (*id.* at 232-233). The court also held that the state law violated Section 208 because it didn't allow him to choose the person to help him complete his absentee ballot. *Id.* at 235.

Similarly, in a recent case in Mississippi, Disability Rights Mississippi as an associational plaintiff challenged a newly enacted law, S.B. 2358, which states that only election officials, postal workers, family members, household members or caregivers can assist voters with disabilities in returning their completed mail-in ballots and imposes criminal penalties and fines on those who violate the law. The term "caregivers" is undefined. Disability Rights Mississippi v. Fitch, Case No. 3:23-CV-350-HTW-LGI (filed May 31, 2023, S.D. Miss.). Prior to the enactment of S.B. 2358, anyone of a voter's choice — including social workers, voting organizations and other trusted individuals — could assist voters with disabilities in returning their completed mail-in ballots. The federal district court issued a preliminary injunction order on July 25, 2023, stopping the law from going into effect as planned; the case is being appealed. Court documents can be viewed here.

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⁵ The restriction on who can assist an institutionalized voter is not unique to North Carolina. For example, Louisiana state law contains a similar restriction on the ability of facility staff to assist a resident to vote. "The voter may receive assistance from any person selected by him, except a person who is prohibited from assisting a voter pursuant to [state law limitations on early voting] and the owner, operator, or administrator of the nursing home or an employee of any of them." LA Rev Stat § 18:1333(G)(4)(a).

5. Can states impose restrictions on when a disabled voter may receive assistance?

No. The VRA and court decisions interpreting it are clear that voters with disabilities may receive assistance in all aspects of the voting process. A recent decision in a federal court action in Wisconsin, *Carey v. Wisconsin Election Commission*, affirmed that Section 208 of the VRA entitles people with disabilities to receive assistance by the person of their choice in returning absentee ballots by mail or in person. 624 F. Supp. 3d 1020 (W.D. Wis. 2022). The federal case followed the Wisconsin Supreme Court's decision in *Teigen v. Wisconsin Elections Commission*, in which the state court, ignoring federal law protections for voters with disabilities, ruled that voters may not receive assistance returning their absentee ballots in person to the municipal clerk. 2022 WI 64, 976 N.W.2d 519, 525 (July 8, 2022). The *Teigen* court expressly declined to address whether voters with disabilities are required to put their own absentee ballots in the mail without assistance, but failed to vacate the lower court decision prohibiting such assistance. *Id.* at 525-526.

The *Teigen* decision sowed confusion and misinformation among local election officials and voters with disabilities in Wisconsin; however the federal court in the *Carey* case laid to rest any questions about the broad applicability of Section 208, concluding that "the VRA requires that plaintiffs be allowed to choose a person to assist them with mailing or delivering their absentee ballot" and holding that state law that prohibits such assistance is preempted by the VRA. *Carey* at 1033.

In addition to Section 208, the Carey case included claims filed under the ADA, Section 504, and the First and 14th Amendments of the U.S. Constitution. The federal court dismissed those claims as moot, finding that complete relief was available pursuant to Section 208. Carey at 1033-1034. The USDOJ filed a Statement of Interest (SOI) in support of the plaintiffs in Carey, asserting that, inter alia, "[t]o the extent that Wisconsin's laws interfere with Defendants' ability to meet their federal civil rights obligations, Section 208 of the Voting Rights Act and Title II of the ADA supersede any conflicting provisions of state law." USA Statement of Interest at 11. The SOI further stated that: Section 208 extends to delivery of absentee ballots (SOI at 6-8) and is broader than a state law affording discretionary accommodations (id. at 8-9); ballot return assistance is a reasonable accommodation under the ADA, and is not a fundamental alteration because it is required by the Voting Rights Act (id. at 9-11); and Section 208 and the ADA preempt more restrictive state laws that interfere with federal rights afforded under those statutes (id. at 11-13).

6. Can states impose restrictions on the type of assistance a disabled voter may receive?

No. In a Texas case involving state restrictions on assistors, a federal district court enjoined enforcement of a state statute that limited assistance to: (1) reading the ballot to the voter; (2) directing the voter to read the ballot; (3) marking the voter's ballot; or (4) directing the voter to mark the ballot. *OCA Greater Houston v. Texas*, No. 1:15-CV-679-RP, 2018 WL 2224082 *2-3 (W.D. Tex. May 15, 2018), modified in part, No. 1:15-CV-679-RP, 2022 WL 2019295 (W.D. Tex. June 6, 2022). In a June 2022 order modifying an earlier injunction issued in 2018, the court found that recent changes to the Texas Election Code⁶ conflicted with its 2018 injunction by: limiting voter assistance to "marking or reading" a ballot and requiring assistors to take an oath attesting to providing impermissibly narrow types of assistance. 2022 WL 2019295 at *3. The court's modified injunction thus bars implementation of these sections of newly enacted Texas law contained in S.B.1. *Id.*

7. Is there a limit on how many people with disabilities an assistor may help to vote?

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⁶ S.B.1, signed into law on September 7, 2021, modified many sections of the Texas Election Code. TX S.B. 1, 87th Legislature 1st Special Session (Tx. 2021). S.B.1 contains a number of voter assistance restrictions which are currently being litigated in the combined case named *La Unión Del Pueblo Entero (LUPE)*, et al. v. Gregory W. Abbott, et al., Civil Action No. 5:21-cv-844 (XR) (Consolidated Cases), W.D. Tx..

Limits on the number of voters with disabilities who can receive assistance by one person or entity, including assistance to return a ballot, remains a concern. In 2021, the Supreme Court held that limits on third-party ballot collection do not violate Section 2 of the Voting Rights Act (52 U.S.C. § 10301); however, limits on ballot return assistance for people with disabilities that may were not addressed in that case. Brnovich v. Democratic Nat'l Comm., 141 S. Ct. 2321, 2348 (2021). Such limits serve to deny voters with disabilities their assistor of choice and likely disenfranchise voters who are dependent on staff in congregate settings by prohibiting staff from assisting them. See, e.g., LA Rev Stat § 18:1333(G)(4)(a) ("...no person except a spouse, blood relative, or the registrar may assist more than one voter [who resides in a nursing home] in voting."). In a recent decision involving limits on how many voters one person can assist at the polls, an Arkansas district court found that a state law that forbids individuals from assisting more than six voters to mark or cast a ballot was preempted by Section 208. Arkansas United v. Thurston, No. 5:20-CV-5193, 2022 WL 4097988 *15 (W.D. Ark. Sept. 7, 2022). The case is on appeal. Case No. 22-2918 (8th Cir. Sept. 12, 2022).

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⁷ See <u>Ballotpedia</u> for state requirements for and limitations on ballot return assistance.

8. Can states impose burdensome oath, residency, form completion, or other impermissible administrative requirements?

Requirements which impede the ability of a person otherwise able or willing to assist voters with disabilities must not be permitted, as such restrictions serve to exclude voters with disabilities from the franchise in violation of Section 208 and the ADA. In 2017, the Fifth Circuit Court of Appeals struck down a Texas state law requirement that interpreters for voters must be registered to vote in the same county as the voter. *OCA-Greater Houston v. Texas, supra*, 867 F.3d at 615. The district court subsequently enjoined the residency requirement, noting that it "is inconsistent with and preempted by Section 208." *OCA Greater Houston v. Texas, supra*, 2018 WL 2224082 at *2. In its recent decision modifying the original injunction against Texas in light of S.B.1, the district court, while explicitly not opining on the merits, declined to ban additional oath and form completion requirements for assistors that were not before the court previously and were not encompassed in the court's 2018 injunction, leaving the issue to be litigated. 2022 WL 2019295 at *4.

9. Are people with disabilities subject to guardianship entitled to assistance, including, for people whose competency is in question, the use of Supported Decision-Making principles as an accommodation to communicate a desire to participate in the voting process, to establish competency to vote, and/or to exercise the right to vote?

Federal law allows states to disenfranchise people who are determined to lack "mental capacity." 52 U.S.C. § 20507(a)(3)(B). Most states restrict the voting rights of some people with mental disabilities even though the term "mental incapacity" has not been defined in federal law or in many states. Some states require that a person subject to guardianship demonstrate an understanding of the voting process.

⁸ See <u>Bazelon Center chart</u> for each state's voter competency laws (current as of October 2020).

Advocates believe that this type of test is illegal because people without disabilities are not subjected to a competency test. To the extent that states choose to have a voter competency requirement, disability advocates argue that laws and practices should hold all individuals to the same standard regardless of whether they have a disability. Indeed, the USDOJ Voting Guidance states that "[t]he ADA...prohibits a state from categorically disqualifying all individuals who have intellectual or mental health disabilities from registering to vote or from voting because of their disability." USDOJ Voting Guidance at 2.

Voter competency requirements only for people with disabilities do currently exist, however, in many states. Ensuring that people subjected to these requirements have the fullest opportunity to become voters, including with the supports and accommodations needed to establish competency and to cast a ballot, affords important protections against exclusionary rules and practices.¹⁰

One such accommodation that should be offered and made available is Supported Decision-Making (SDM) which "occurs when people with disabilities use friends, family members, and professionals to help them understand the everyday situations they face and choices they must make, allowing them to make their own decisions...." While often seen as an alternative to guardianship, SDM principles fit squarely in the voting context insofar as "SDM works in the same way that most adults make daily decisions—by seeking advice, input, and information from others who are knowledgeable and whom the adult trusts." 12

⁹ For more in-depth analysis of this issue, see <u>Bazelon Center comments</u> to National Institute for Standards and Technology (July 2021).

¹⁰ For more information on the right to accommodations in the voting process for people with mental disabilities, see NDRN's publication <u>Voting Accommodations for People with Mental Disabilities</u> (2022).

¹¹ National Council on Disability, *Beyond Guardianship: Toward Alternatives that Promote Greater Self-Determination* at 130.

¹² *Id.*

In recent years, the <u>American Bar Association</u>, the <u>Uniform Law Commission</u>, and six states¹³ have adopted an approach to voting competency that strives to protect the federal constitutional and civil rights of people with disabilities and address concerns about election integrity. This model centers on the person's ability to communicate a choice, with or without accommodations, about whether to vote and who to vote for, and means that no one should have to take a test, demonstrate knowledge of the voting process, candidates, or issues, or otherwise be subjected to a standard that is not applied to anyone else. Under the ABA and Uniform Law Commission model legislation,¹⁴ individuals retain the right to vote even if placed under a guardianship unless:

- a. the court makes explicit and written findings,
- b. based on clear and convincing evidence,
- c. that the individual cannot communicate, with or without reasonable accommodations, a specific desire to participate in the voting process, and
- d. The individual whose voting rights are at stake receives notice in a language and form they can understand, and has an opportunity to be heard in court, specifically as to the right to vote.

10. Do people with disabilities who are in institutional settings have the right to vote and to receive assistance in the same manner as all other voters (barring legal restrictions due to the conditions of their confinement)?

Most people who are institutionalized in nursing facilities, psychiatric

¹³ The six states are: California (Cal. Elec. Code § 2208), Maine (Me. Rev. Stat. tit. 18-C, § 5-310(2)), Maryland (Md. Code, Elec. Law § 3-102(b)(2)), Nevada (Nev. Rev. Stat. § 293.5415), New Mexico (N.M. Const. Art. VII, § 1), and Washington State (160 Wash. Rev. Code §§ 11.130.310 and 11.130.655).

¹⁴ See UGCOPAA §§ 310(a)(3) and 604.

hospitals, and other congregate settings are eligible to vote. However, for people who reside in such institutions, whether they are able to vote is very dependent on staff attitudes and assistance.¹⁵ In addition, many face restrictions on the manner of voting and/or the assistance they may receive to vote at all.¹⁶ The ADA protects institutionalized voters from discrimination and affords them the same rights as other people with disabilities.

Citing the example of an individual who is refused a voter registration form or an absentee ballot because of their placement in a nursing facility, the USDOJ Voter Guidance states that "[p]ublic entities must ensure that they do not have policies, procedures, or practices in place that interfere with or prohibit persons with certain disabilities from registering to vote or voting based on their disability." USDOJ Voter Guidance at 4. During the COVID pandemic, the Centers for Medicare and Medicaid Services (CMS) issued a Memorandum affirming the right of nursing facility residents to vote. CMS, Compliance with Residents' Rights Requirement related to Nursing Home Residents' Right to Vote, Oct. 5, 2020. The Memorandum stated that a "resident's rights, including the right to vote, must not be impeded in any way by the nursing home and its facility staff." *Id.* at 2. The Memorandum also made clear that nursing facilities are required to help and support residents to vote, including helping them to register, to request and return an absentee ballot, to fill out a ballot with the help of the person they choose (subject to applicable restrictions), or to go to a polling location or drop box. Id. This Memorandum suggests that nursing facility residents must be able to choose the manner in which they cast their ballot, and that assistance must be provided for them to do so.

11. What about the possibility of disabled voters being the victim of fraud or manipulation by an assistor?

It is important to remember that actual fraud is punishable and the individuals who commit fraud are the ones who should be punished. While concerns about "election security" and voter fraud have dominated

¹⁵ See Jason H.T. Karlawish *et al., Identifying the Barriers and Challenges to Voting by Residents in Nursing Homes and Assisted Living Settings*, 20 J. AGING SOC. POLICY 65 (2008).

¹⁶ See, Kohn, Nina A., "Coronavirus isolated nursing home residents. Now it might keep them from <u>voting</u>." Washington Post, Oct. 14, 2020.

discussions about voting rights, the fact remains that instances of actual fraud in the general population are extremely rare and incidents of fraud involving people with disabilities are negligible.

Notably, the legislative history of Section 208 indicates that allowing people with disabilities to vote with their assistor of choice is a means of preventing voter fraud, as described by the court in in *Disability Rts. N. Carolina* when it rejected the state's arguments that restrictions on voter assistance were needed to prevent fraud:

"[T]he Committee has concluded that [voters] must be permitted to have the assistance of a person of their own choice. The Committee concluded that this is the only way to assure meaningful voting assistance and to avoid possible intimidation or manipulation of the voter. To do otherwise would deny these voters the same opportunity to vote enjoyed by all citizens."

Disability Rts. N. Carolina v. N. Carolina State Bd. of Elections, No. 5:21-CV-361-BO, 2022 WL 2678884 *4 (E.D.N.C. July 11, 2022), quoting S.Rep. 97-417, 1982 U.S.C.C.A.N. 177, 240-41 (emphasis added).

A better approach is to ensure that institutionalized voters have access to information and assistance to ensure that they can vote equally to other voters with and without disabilities.¹⁷

12. Where Can I Find Local Resources to Help a Disabled Voter Get the Assistance They Need?

 Contact your state's Protection and Advocacy organizations (Find your state's P&A here.) P&As work year-round to educate voters with disabilities about their rights. P&As also have unique access to meet with people in institutional settings, who are often less likely to be contacted about their voting rights.

¹⁷ For more discussion of the voting rights of people with disabilities in institutions, see NDRN's publication, <u>Voting Rights of Institutionalized People with Disabilities</u> (2022).

- The state Long-Term Care Ombudsman program may be able to help
 if a person who lives in long-term care facility, such as a nursing
 home or assisted living facility, is having difficulty exercising their right
 to vote. The National Ombudsman Resource Center has contact
 information for each state's program.
- Additional assistance, such as rides to polling places, may also be available. The <u>Eldercare Locator</u> can connect older adults to local assistance, and the <u>Disability Information and Assistance Line</u> can do the same for people with disabilities. Both are available by phone or live chat Monday - Friday from 8 a.m. to 9 p.m. (Eastern).
- Contact a local organization that has information and/or resources about voting for people with disabilities. You may want to consider the following organizations.
 - GoVoter Project by SABE, Self Advocates Becoming Empowered
 - REV UP: Register, Educate, Vote, Use your Power by AAPD,
 American Association for People with Disabilities
 - A local chapter of <u>The Arc</u>