



**Division for Research, Policy and Programs
U.S. Election Assistance Commission
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MEMORANDUM

TO: Gineen Beach, Chair
Gracia Hillman, Vice Chair
Donetta Davidson, Commissioner

CC: Thomas Wilkey, Executive Director
Tamar Nedzar, Associate General Counsel

FROM: Karen Lynn-Dyson, Director for Research, Policy and Programs
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SUBJECT: Translation of NVRA Form into the Five Asian Languages Covered Under the
Voting Rights Act – Options for Consideration

DATE: October 30, 2009

BACKGROUND

Early on in its history EAC undertook efforts to make its products available in languages other than English so that election officials would be provided with the resources they need to administer elections. One of EAC's first endeavors, under its Language Accessibility Program, was to translate the national voter registration (NVRA) form into Spanish. The agency has also issued a voters guide in Spanish, and has translated major portions of EAC's Website into Chinese, Japanese, Korean, Vietnamese, Tagalog, and Spanish.

In order to broaden the scope of the Language Accessibility Program, in 2006, EAC began an effort to translate the national voter registration form into five common Asian languages: Chinese, Japanese, Korean, Vietnamese, and Tagalog. As with previous translation projects, EAC first convened a working group to discuss the different approaches the agency should consider in providing the national voter registration form in these five Asian languages. It became apparent through these working group discussions that the groups could not reach consensus on the best approach to achieve the goal of translating the form.

Need for a Common Election Terminology

One of the biggest challenges that the EAC faced was that there had not previously been any comprehensive translation of election-specific terms into these 5 languages. In recognition of the need for common terminology, the EAC began creating glossaries of commonly-used election terms. While creating these resources, the EAC consulted with translation experts and native speakers. The resulting glossaries issued in Chinese, Japanese, Korean, Vietnamese, and Tagalog (in addition to Spanish) have been broadly distributed and utilized by the elections community. Election officials have reported to EAC staff that the glossaries provide an invaluable resource for the affected communities. EAC staff receive ongoing requests for additional hard copies of the glossaries; ongoing use of these and other resources which are readily accessed in the Language Accessibility Section of the EAC Website, are also reported by EAC staff.

Creating and widely distributing these glossaries has provided EAC with a standardized set of terms from which it can provide translations of other election materials. Having this foundation was an important first step to ensuring consistency and uniformity in whatever translations EAC provides in the future.

Alternative Layouts for the Translated Form

Asian language working group participants identified the two ways in which the national voter registration form could be laid out; monolingual or bilingual. A monolingual Chinese form, for example, would be written entirely in Chinese. By contrast, a bilingual Chinese form would contain both Chinese and English. The members of the working group did not reach agreement on whether one approach would be more beneficial than the other.

In October 2009, EAC staff undertook a study to assess the benefits and feasibility of translating the national voter registration form in the two ways in which the working group identified; monolingual and bilingual. The findings from the study are available on the EAC's Website.

OPTIONS FOR TRANSLATING THE NVRA FORM

Based on the information gathered in the study, EAC staff is presenting three options for the Commissioners to consider regarding the translation of the national voter registration form, (which consists of a two-page application, general instructions, and state-specific instructions.)

The three options are 1) monolingual translation, 2) bilingual translation and, 3) both monolingual and bilingual translation.

Option 1- Monolingual Translation of the NVRA Form.

Advantages:

Producing the NVRA form in a monolingual format allows all of the information to be on one page. A monolingual form is considered easier to read (i.e. given larger fonts and expanded text). The monolingual form is also likely to be easier to complete because all items will be in one language. Finally, a monolingual layout is likely to be more easily accessible to persons with disabilities.

Disadvantages:

A monolingual layout might be more difficult for election officials to process.

Option 2- Bilingual Translation of the NVRA Form.

Advantages:

Each section on the form is easily identifiable, making it easier to produce the NVRA form into a bilingual format. Also, election officials may find the bilingual forms easier to process because data fields can be more easily identified. Finally, individuals filling the form out will be able to view both languages.

Disadvantages:

This format will likely require altering the layout to accommodate smaller fonts. This altered layout, in turn, may result in the form being less accessible to persons with disabilities than a monolingual form, (although, regardless, the EAC would test the bilingual version for accessibility.) In addition, a new layout accommodating two languages may be more confusing for both registrants and election officials.

Option 3- monolingual and bilingual translation of the NVRA form

Advantages:

Making the NVRA form available in both formats could allow flexibility for both registrants and election officials and allow voters to have a choice regarding his/her preferable format.

Disadvantages:

None are readily apparent.

COST AND TIMEFRAME FOR TRANSLATING THE FORM

The costs associated with translating the national voter registration form into a monolingual (option 1) versus bilingual (option 2) form are relatively equivalent.

The cost for producing both a monolingual and bilingual form --option 3-- doubles the overall cost.

With any of the options, there will be an ongoing cost for maintaining the form. Any time a state changes its instructions, for example, the EAC will need to pay for the translation into another language.

If the EAC moves forward with translating the form into the five Asian languages, EAC staff fully anticipate it will be readily available and distributed prior to the 2010 Primary Season.