

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

<hr/>)	
AMERICAN COUNCIL OF THE BLIND, <i>et al.</i> ,)	
)	
	Plaintiffs,)	
)	
	v.)	Case No. 1:02-cv-00864-BAH
)	
STEVEN T. MNUCHIN, Secretary of the)	
Treasury,)	
)	
	Defendant.)	
<hr/>)	

DEFENDANT’S TWENTIETH STATUS REPORT

Defendant, by his undersigned counsel, hereby submits this Twentieth Status Report pursuant to paragraph 4 of the Court’s Order and Judgment of October 3, 2008 (Doc. 96), and the Court’s Order of August 15, 2012 (Doc. 121), which require the defendant to file semi-annual status reports describing the steps taken to implement the Order and Judgment.

1. The Bureau of Engraving and Printing (“BEP” or “Bureau”) continues to make progress in exploring the options contained in a three-pronged approach to providing meaningful access to United States currency by (1) adding a raised tactile feature to each Federal Reserve note that the BEP may lawfully redesign, (2) distributing electronic currency readers for blind and other visually impaired U.S. citizens and legal residents, and (3) continuing the Bureau’s program of adding large, high-contrast numerals and different colors to each denomination that it may lawfully redesign.

2. BEP continues to pursue the creation of a durable, usable, and manufacturable tactile feature. As explained in prior filings, the tactile feature must satisfy the following criteria: It must enable blind and other visually impaired persons to denominate currency effectively; it

must be able to function in commerce without interfering with security features; it must be sufficiently durable to remain usable through the extensive handling of currency; and BEP's machinery must be able to produce the feature consistently in the large volumes required.

Although BEP has narrowed the potential application methods for a tactile feature to either Intaglio or Coated-Embossed, the Bureau does not currently have a tactile feature that fully satisfies all of these criteria.

3. The Bureau is currently in the final testing phases of the two remaining potential application options. These tests include durability testing, manufacturing tests, banking and handling machinery testing, and functionality testing with the blind and visually impaired community. Since defendant filed his last status report in March 2018, a contractor has conducted functionality testing involving a total of approximately 240 individuals in small focus groups and at the conferences of several organizations in various cities throughout the country. All of this testing is intended to support the final selection of an application method by the end of this year. BEP also hopes to improve the accuracy rate for tactile features; so far, the best accuracy rate has been only approximately 80% in one small focus group. It is unknown whether this accuracy rate can be improved, or even matched, in large-scale testing.

4. After selection of the application method and integration of the tactile feature into a potential overall currency design, the design will be subjected to additional testing. As part of longstanding practice, all U.S. currency must survive a series of durability tests designed to simulate the actual use and circulation of currency. These include a Crumble test that crushes the currency a number of times, a Laundering test that simulates accidental washing of currency, and a Chemical Resistance test that saturates the bills with chemical substances. All features of a bill, including security features and a tactile feature, must be able to survive these tests.

Additionally, sample bills with the chosen tactile feature application method will be subjected to a Scrape test simulating abrasion with a coin or fingernail, and a Humidity test simulating long exposure to humid conditions. It is unknown at this time whether any tactile feature will successfully pass all of these tests.

5. By late 2019, BEP intends to make a final decision as to which potential tactile feature option, if any, is able to meet all of the criteria described above and thus can be included in the next redesign of the currency. BEP and the Department of the Treasury still intend to have the first denomination of the redesign ready for production no later than 2026.

6. Aside from the tactile feature, BEP continues to provide meaningful access to the currency for a large proportion of blind persons through a currency reader distribution program operated in conjunction with the National Library Service of the Library of Congress. As of September 12, 2018, the program has distributed approximately 64,967 readers. The Bureau continues to receive very positive feedback regarding the readers. Of the 11,976 calls the call center has received since the currency reader program began, only 87 have been registered as complaints, most of which were user-related errors in operating the device that were easily resolved.

7. In August 2018, BEP conducted two additional pilot programs to distribute currency readers through third-party organizations – specifically, the Association of Assistive Technology Act Programs (“ATAP”) of Georgia and the San Francisco (California) Lighthouse for the Blind. (The ATAP program described in defendant’s status report of March 2018 involved ATAP of Delaware.)

8. BEP also continues to provide meaningful access for a large segment of the blind community through mobile device applications, which allow smartphones and similar devices to

function as currency readers. The number of downloads of these applications continues to increase. The EyeNote app for Apple devices, which BEP developed, has been downloaded approximately 55,171 times. The IDEAL Currency Identifier app for the Android operating system has been downloaded approximately 16,779 times.

9. Lastly, BEP continues to conduct extensive public outreach in connection with its meaningful access program, primarily to promote the currency readers. Since March 2018, the Bureau has participated in the conferences of thirteen organizations serving the blind and visually impaired, during which BEP enlisted additional advocacy groups for reader distribution. Also, in March 2018, BEP Director Leonard Olijar was interviewed by two different radio programs focusing on people with visual impairments, both of which were broadcast over radio and distributed by podcast in May 2018. The reader distribution program and mobile device applications were described as part of each interview.

Dated: September 17, 2018

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

JESSIE K. LIU
United States Attorney

JOSHUA E. GARDNER, D.C. Bar 478049
Assistant Director

/s/ W. Scott Simpson

W. SCOTT SIMPSON, Va. Bar 27487
Senior Trial Counsel

Department of Justice, Civil Division
318 South Sixth Street, Room 244
Springfield, Illinois 62701
Telephone: (202) 514-3495
Facsimile: (217) 492-4888
E-mail: scott.simpson@usdoj.gov

COUNSEL FOR DEFENDANT