Campaign Finance Board 5-Year Accessibility Plan

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General

Disability Service Facilitator (DSF) / Digital Inclusion Officer (DIO):

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Link: [Nondiscrimination/Notice of Rights/Grievance Procedure](#)

Link: [Website Accessibility Statement](#)

Mission and Background of Agency

The New York City Campaign Finance Board (CFB) is dedicated to making our local democracy more open, transparent, and equitable. We eliminate barriers to participation by providing access to the information and resources New Yorkers need to vote or run for office and reduce the corrupting influence of money in politics by enhancing the impact of New Yorkers' small-dollar contributions.

The CFB administers one of the strongest, most effective campaign finance systems in the country. NYC's matching funds program amplifies the voice of average New Yorkers in city elections by matching their small contributions with public funds. By increasing the value of small-dollar contributions, the program reduces the possibility and perception of corruption from large contributions and unlimited campaign spending and encourages citizens from all walks of life to run for office. Through its rigorous oversight and enforcement efforts, the CFB holds candidates accountable for using public funds responsibly.

The CFB publishes detailed public information about money raised and spent in city elections by candidates and independent spenders, bringing greater transparency to the democratic process. Its NYC Votes campaign engages and educates voters through community outreach, the Voter Guide, and Debate Program, empowering New Yorkers to make informed choices at the polls. In addition, the CFB seeks to improve the voter experience by advocating for legislative changes to the registration and voting process.

The CFB is a non-mayoral government agency that employs around 185 people, with these numbers expecting to increase to 200+ in early 2024. Most of our employees hold the Civil Service title of either CFB Analyst I or CFB Analyst II. However, our office titles vary across the agency and employees at every level hold office titles that correspond to how they contribute to the overall mission of the CFB. These titles range from that of auditor, specialist, and coordinator to that of manager, director, attorney and executive staff.

Executive Summary

The CFB is committed to fostering accessibility throughout all facets of the agency. That is why our 5-year accessibility plan outlines a comprehensive strategy to enhance different aspects of accessibility, with specialized effort concentrated in areas where we identified access issues and key barriers. After completing an internal audit of current accessibility offerings in our spaces, policies, and agency-wide practices, we found that we are mostly ADA (Americans with Disabilities Act) compliant in our physical space and have enacted significant workplace inclusion efforts. However, three main areas of concern arose: digital access, communication access, and programmatic access. Our goal over the next five years of this plan is to focus our efforts in significantly improving upon our accessibility practices in these areas.

Although our audit showed that we are currently doing essential work in these areas, we know that there are always ways to improve. We have already elected Kirann Nesbit, our current Disability Service Facilitator (DSF), to also assume the title of Digital Inclusion Officer (DIO) and lead our continued efforts to meet the goals of our 5-year plan. In addition to the efforts by the CFB's Equal Employment Opportunity/Diversity, Equity, and Inclusion division, various other CFB departments and/or divisions will work in conjunction to ensure these goals are met. Additionally, the CFB intends on working with our digital partners that specialize in assisting organizations with making their digital platforms and communications both ADA and WCAG (Web Content Accessibility Guidelines) compliant and accessible. In the past, we have worked in partnership with Blue State Digital to bring our adjoining website, nycvotes.org, in alignment with these standards. Because a large part of our 5-year plan includes focusing on technology-backed accessibility barriers in the areas of digital access, communication access, and programmatic access, we expect a continued collaboration between the CFB and our digital partners.

Some of the key steps of our 5-year plan include, but are not limited to:

1. Committing to including "alt text" for all images on our agency's social media platforms, website, and digital communication materials.
2. Committing to including captions for all videos (CC on those that support it); posted on our agency's social media platforms, website, and communication material.
3. Ensuring our agency has mechanisms in place to transcribe any material into various accessible formats such as large print and braille.
4. Committing to regularly maintaining our agency's social media platforms, website, and communication materials to the most up-to-date ADA and WCAG standards.
5. Offering transcripts and a screen reader format of all communication materials (i.e. training visuals).

6. Reminding employees how to arrange accessibility services (i.e. auxiliary aids, specific lighting, etc.) and making plans to periodically send out such reminders to the entire agency.
7. Ensuring our agency has mechanisms in place to provide CART (Real-Time Captioning), ASL (American Sign Language) interpretation, multi-language, large print, and Braille versions of documents upon request.
8. Ensuring relevant staff is trained in creating materials that use plain language and know how to create and access material in various formats.
9. Ensuring all agency event notices include information about accessibility features and how to request additional accommodation(s).

The CFB will also monitor and maintain compliance with the ADA and WCAG standards in the areas that we are already effectively meeting and exceeding the standards in place- these include physical accessibility and workplace inclusion.

Our audit illustrated that our agency's physical spaces are mostly ADA compliant, and our Equal Employment Opportunity/Diversity, Equity and Inclusion division has made great strides in workplace inclusion practices. We will continue to increase efforts in these spaces as well though based on research and best practices as communicated by those within various disability communities.

Accessibility Statement

Currently, our website accessibility statement reads, "The NYC Campaign Finance Board is committed to ensuring its digital content is accessible to and usable by people with disabilities. We are continually improving the user experience for everyone and applying the relevant accessibility standards." As a part of our 5-year plan, we want to expand this statement to be more inclusive of our agency's accessibility positioning overall, and not focus solely on digital content.

This expanded statement includes the following:

The CFB has an unwavering commitment to accessibility, ensuring that our digital content and assets, programs, training materials, physical spaces, and campaign services are available and accessible to all. We recognize the importance of maintaining strict compliance with both ADA and WCAG standards, as well as exceeding these requirements to better serve the diverse community we serve in New York City. Because of that, increased accessibility is at the forefront of our mission over the next five years. The CFB is fully dedicated to meeting and exceeding the accessibility standards set by regulatory bodies to provide an accessible and equitable experience for everyone interacting with our agency.

Maximizing accessibility is an ongoing commitment that permeates every aspect of the CFB. Regular accessibility audits ensure that our digital content and assets, programs, training materials, physical spaces, and campaign services comply with the latest standards. We actively seek and address feedback through our Website Accessibility Feedback Form, and value it as a critical tool for continuous improvement.

A recent significant achievement in our accessibility journey is our achieved ADA and WCAG compliance on our voter focused website, nycvotes.org. This underscores our dedication to making strides in one of our agency's barriers, digital access. This

accomplishment exemplifies our ongoing efforts to enhance accessibility and improve the overall user experience for our community.

Looking forward, we are setting achievable goals over the next five years to further advance accessibility within facets of our digital and technology-based infrastructure, specifically focusing on digital access, communication access, and programmatic access. Agency-wide training will also continue to be a cornerstone of the CFB, ensuring that our employees remain informed about the evolving landscape of accessibility standards, best practices, and what we are doing at the CFB to meet and maintain those standards.

The CFB sees accessibility not only as a legal requirement but as a moral imperative. Our dedication to accessibility is embedded in our culture, and we will continue to lead by example, providing an accessible and welcoming experience for all members of the New York City community.

Agency Plan

Physical Access

1. **Access Issues**
   a. The restrooms that are located at 100 Church St., 12th Floor, are not ADA compliant, as they currently require an access code, are not wheel-chair accessible, and the doors are perceived as being heavy. Beyond this area of concern, all the physical spaces within the CFB are ADA compliant.
2. **Actions**
   a. We will be engaging in a collaborative dialogue with building management about the current bathroom options available and the course of action to take to remedy the situation.
3. **Timeline**
   a. 3 Years
4. **Roles and Responsibilities**
   a. The Equal Employment Opportunity / Diversity, Equity, and Inclusion division of the CFB will be the main point of contact. Employees, visitors, or anyone associated with the agency should contact this office with any inquiries, comments or questions related to accessibility and accommodations. From there, the Disability Service Facilitator (Kirann Nesbit) of the CFB may undertake appropriate actions to reasonably accommodate the needs of the requesting party.
   b. The Administrative Operations, Facilities and Logistics and Staff Support services departments of the CFB will work in conjunction with the Disability Service Facilitator to facilitate any requests concerning accessibility services/equipment.
5. **Outcome Tracking**
   a. We will track any changes and improvements made to physical access through our internal accessibility plan tracking system, which was made with Excel.

Digital Access

1. **Access Issues**
   a. Lack of employee awareness of laws and standards relating to digital accessibility relevant to the content they create (WCAG 2.1 Level AA, Local Law 26 of 2016, ADA, Section 508, etc.).
   b. Lack of specific policies and/or procedures related to the creation of accessible digital content.
   c. Lack of specific training on what makes digital content accessible and how to create that content in an accessible given to employees who create digital content.
   d. Non-existence of procedural process in place for the review of digital content to ensure its accessibility.
   e. Lack of knowledge by those involved in the procurement of digital products and services aware of accessibility requirements that apply to websites, apps, kiosks, and other digital content.
   f. Lack of existing policies and procedures that ensure that contracts for digital products and services provide specific standards and expectations about accessibility within the language.
   g. Lack of an existing review process to check that digital products and services which are purchased are indeed accessible and usable by New Yorkers with disabilities.
   h. Lack of provisions addressing accessibility incorporated into the performance evaluations of employees responsible for digital content.
   i. Lack of testing our website's accessibility by using testers with different disabilities (including individuals who are blind/low vision, deaf, and have physical disabilities which limit their ability to use a mouse).
   j. Lack of meaningful (not generic, AI generated) alternative text descriptions which conveys the information and purpose of the image, using programmatic alt text (i.e.,alt=". . ." or aria-label=". . .") on our images.
   k. Lack of Closed Captioning (CC), or embedded captions, on videos that are not just auto generated and include both, indications of significant background sounds and the names of those speaking.
   l. Lack of ASL interpretation and Deaf-Blind interpretation on videos, either built into (video-in-video) the original video or providing a separate ASL and Deaf-Blind interpreted version which is linked to from the page of the original.
   m. Lack of audio descriptions on videos, either as part of the original or as a separate version with a link to it from the original's page.
   n. Lack of meaningful (not generic, AI generated) alternative text descriptions, which conveys the information and purpose of the

image, on all social media content that uses images by using the social media platforms' built-in alt text mechanism.

o. Lack of avoiding the use of ASCII text on all social media posts.

p. Lack of employee awareness of, and following, the principles of accessible document creation as outlined in MOPD's Accessible Documents Guide, Accessible PPT Guide, and Accessible PDF Guides.

q. Lack of review process to ensure electronic documents are accessible prior to public distribution.

r. Lack of continuous evaluation of our internal applications and tools (including those that are web-based) for compliance with the W3C's Web Content Accessibility Guidelines 2.1 Level AA.

s. Lack of ASL interpretation and Deaf-Blind interpretation available to those who request them on the any virtual meeting platform being used.

2. Actions

a. Make employees who create digital content aware of laws and standards relating to digital accessibility relevant to the content they create (WCAG 2.1 Level AA, Local Law 26 of 2016, ADA, Section 508, etc.) through training and sharing of accessibility requirements.

b. Creating specific policies and/or procedures related to the creation of accessible digital content.

c. Enrolling employees who create digital content in specific training on what makes digital content accessible and how to create that content in an accessible manner.

d. Implementing a process in place for the review of digital content to ensure its accessibility.

e. Making those involved in the procurement of digital products and services aware of accessibility requirements that apply to websites, apps, kiosks, and other digital content.

f. Putting policies and procedures in place to ensure that contracts for digital products and services provide specific standards and expectations about accessibility within the language.

g. Putting a review process in place to check that digital products and services which are purchased are indeed accessible and usable by New Yorkers with disabilities.

h. Providing provisions addressing accessibility incorporated into the performance evaluations of employees responsible for digital content.

i. Testing our website's accessibility by using testers with different disabilities (including individuals who are blind/low vision, deaf, and have physical disabilities which limit their ability to use a mouse).

j. Giving all images meaningful (not generic, AI generated) alternative text descriptions which conveys the information and purpose of the image, using programmatic alt text (i.e.,alt=". . ." or aria-label=". . .").

    k. Including Closed Captioning (CC), or embedded captions, on videos that is not just auto generated and include: indications of significant background sounds and the names of those speaking.

    l. Including ASL interpretation and Deaf-Blind interpretation on videos, either built into (video-in-video) the original video or providing a separate ASL and Deaf-Blind interpretation version which is linked to from the page of the original.

    m. Providing audio descriptions on videos, either as part of the original or as a separate version with a link to it from the original's page.

    n. Providing meaningful (not generic, AI generated) alternative text descriptions, which conveys the information and purpose of the image, on all social media content that uses images by using the social media platforms' built-in alt text mechanism.

    o. Avoiding the use of ASCII text on all social media posts.

    p. Making the creators of electronic documents aware of, and following, the principles of accessible document creation as outlined in MOPD's Accessible Documents Guide, Accessible PPT Guide, and Accessible PDF Guides.

    q. Create a review process to ensure electronic documents are accessible prior to public distribution.

    r. Evaluating our internal applications and tools (including those that are web-based) for compliance with the W3C's Web Content Accessibility Guidelines 2.1 Level AA.

    s. Providing ASL interpretation and Deaf-Blind interpretation available to those who request them on the any virtual meeting platform being used.

3. Timeline
    a. 1 year
    b. 2 years
    c. 2 years
    d. 2 years
    e. 3 years
    f. 3 years
    g. 3 years
    h. 3 years
    i. 2 years
    j. 2 years
    k. 2 years
    l. 4 years
    m. 4 years
    n. 1 year
    o. 1 year
    p. 1 year
    q. 2 years
    r. 3 years
    s. 4 years

4. **Roles and Responsibilities**
    a. The Digital Inclusion Officer.
    b. All other departments and/or divisions of the CFB.
    c. Representatives of contracted companies that are charged with creating accessible digital content.
5. **Outcome Tracking**
    a. We will track any changes and improvements made to digital access through our internal accessibility plan tracking system, which was made with Excel.

Programmatic Access

1. **Access Issues**
    a. While no significant issues have arisen in terms of access for our matching funds program, the CFB has identified that there is space for program improvements including but not limited to making our matching funds program education materials (videos, print, and online interface/data) more accessible.
    b. Voter Education and Outreach Program; currently, not all of our voter education material is available in a variety of accessible media.
2. **Actions**
    a. The CFB will regularly conduct audits of our programmatic access for both our Matching Funds program and Voter Education and Outreach programs.
    b. Internally ensure that our Candidate Guidance and Policy division create accessible materials and interfaces for those that interact with our matching funds program.
    c. The CFB will regularly survey program participants to determine what, if any, accommodations would be helpful for them to improve their experience.
    d. Internally ensure that our Voter Education and Outreach material is produced in a variety of accessible mediums including but not limited to Braille, large print, ASL, and ensuring our digital content is screen reader compatible.
    e. Ensuring that all of our voter education materials are written in accessible/plain language and take a readable format.
    f. Ensuring that all of our voter education materials are produced in a variety of accessible platforms and mediums.
3. **Timeline**
    a. 1 year
    b. 3-4 years
    c. 3 years
    d. 3-4 years
    e. 5 years
    f. 5 years
4. **Roles and Responsibilities**

      a. Members of the Equal Employment Opportunity / Diversity, Equity, and Inclusion division of the CFB.

      b. Public Affairs Division (charged with voter education and outreach)

      c. Information Technology Division

      d. Representatives of contracted companies that are charged with creating accessible digital content.

      e. Candidate Guidance and Policy Division (charged with helping candidates navigate the matching funds program)

5. Outcome Tracking

      a. We will track any changes and improvements made to programmatic access through our internal accessibility plan tracking system, which was made with Excel.

Effective Communications

1. Access Issues

      a. Lack of information to employees about how to arrange for auxiliary aids and services.

      b. Lack of information to employees about which of our agency's spaces are looped or equipped with other assistive listening systems.

      c. Lack of information to employees about how a companion of a program participant has a right to auxiliary aids and services if they are someone with whom it would be appropriate to communicate.

      d. Lack of a process/mechanism for providing Video Remote Interpretation.

      e. Lack of a process/mechanism for providing closed captioning on videos.

      f. Lack of a process/mechanism for providing assistive listening devices.

      g. Lack of a process/mechanism for providing documents in braille.

      h. Lack of a process/mechanism for providing documents in large print.

      i. Lack of a process/mechanism for providing documents as audio recordings.

      j. Lack of a process/mechanism for providing people in the physical office space who are blind/low vision a verbal orientation of room and/or the workspace.

      k. Lack of a communication card to aid in-person interactions with people who are D/deaf or Hard of Hearing.

      l. Lack of training for employees and officials to know how to respond to telephone calls made through a Telecommunications Relay Service (TRS) so that the calls are responded to in the same manner as other telephone calls.

      m. Current non-participation in the ASL Direct Program.

n. Promotional materials for public events (social media, flyers, invitations, etc.) lack compliance with Local Law 28 of 2016 (has info about access & accommodations and info on how to request additional accommodations).

o. Non-existence of a list that contains information about the spaces equipped with hearing loops and other assistive listening systems, as well as projects that are in design or under construction that will include the installation of a hearing loop system,

p. Lack of availability of micro loops at each security, information, or reception desk used for the check-in or screening of people attending meetings or events in a looped venue.

q. Lack of proper signage at each venue with an assistive listening system. (I.e., signage outside the given space and any associated security, information, or reception areas using the international symbol of access for hearing loss with a "T" in lower right corner if induction loop.)

r. Lack of verbiage on materials and communications that directly ask if accessibility tools would be helpful to any viewer, such as, "Would ASL/CART be helpful for you?" or "Would braille or audio descriptions be helpful for you?"

2. **Actions**

a. Providing information to employees about how to arrange for auxiliary aids and services.

b. Providing information to employees about which of our agency's spaces are looped or equipped with other assistive listening systems.

c. Providing information to employees about how a companion of a program participant has a right to auxiliary aids and services if they are someone with whom it would be appropriate to communicate.

d. Creating a mechanism for providing Video Remote Interpretation.

e. Creating a mechanism for providing closed captioning on videos.

f. Creating a mechanism for providing assistive listening devices.

g. Creating a mechanism for providing documents in braille.

h. Creating a mechanism for providing documents in large print.

i. Creating a mechanism for providing documents as audio recordings.

j. Creating a mechanism for providing people in the physical office space who are blind/low vision a verbal orientation of room and/or the workspace.

k. Providing a communication card to aid in-person interactions with people who are D/deaf or hard of hearing.

l. Training employees and officials know how to respond to telephone calls made through a Telecommunications Relay

Service (TRS) so that the calls are responded to in the same manner as other telephone calls.

    m. Beginning agency Participation in the ASL Direct Program.

    n. Making sure promotional materials for public events (social media, flyers, invitations, etc.) comply with Local Law 28 of 2016 (has info about access & accommodations and info on how to request additional accommodations).

    o. Maintaining a list of spaces equipped with hearing loops and other assistive listening systems, as well as projects that are in design or under construction that will include the installation of a hearing loop system,

    p. Creating micro loops at each security, information, or reception desk used for the check-in or screening of people attending meetings or events in a looped venue.

    q. Installing proper signage at each venue with an assistive listening system. (I.e., signage outside the given space and any associated security, information, or reception areas using the international symbol of access for hearing loss with a "T" in lower right corner if induction loop.)

    r. Including verbiage on materials and communications that directly ask if accessibility tools would be helpful to the viewer, such as, "Would ASL/CART be helpful for you?" or "Would braille or audio descriptions be helpful for you?" instead of targeting those efforts toward persons with disabilities.

3. **Timeline**
   a. 1 year
   b. 1.5 years
   c. 1 year
   d. 2 years
   e. 2 years
   f. 3 years
   g. 3 years
   h. 3 years
   i. 3 years
   j. 2 years
   k. 4 years
   l. 4 years
   m. 2 years
   n. 5 years
   o. 5 years
   p. 5 years

4. **Roles and Responsibilities**
   a. The Equal Employment Opportunity / Diversity, Equity, and Inclusion division of the CFB.
   b. The People Operations division of the CFB.
   c. The Technology division of the CFB.
   d. Representatives of contracted companies that are charged with creating accessible digital content.

5. **Outcome Tracking**
   a. We will track any changes and improvements made to communications through our internal accessibility plan tracking system, which was made with Excel.

Workplace Inclusion

1. **Access Issues**
   a. Lack of participation in disability-inclusive recruitment events (e.g., DCAS and NYC: ATWORK recruitment events targeted to people with disabilities and/or Agency Spotlight Events).
   b. Lack of sharing job postings with State Vocational Rehabilitation (VR) agencies and other organizations that work with people with disabilities, such as CUNY LEADS, Job Path, etc.
   c. Lack of tools and technology that are accessible to all employees, such as the availability of access technology (magnification, voice recognition, screen readers, etc.).
   d. Non-existence affinity group/employee resource group (ERG) for people with disabilities.
   e. Lack of internship and fellowship opportunities for people with disabilities through programs such as the Partnership for Inclusive Internships.
   f. Lack of first aid kits for guide dogs that may enter the physical office space.
2. **Actions**
   a. Participating in disability-inclusive recruitment events (e.g., DCAS and NYC: ATWORK recruitment events targeted to people with disabilities and/or Agency Spotlight Events).
   b. Sharing job postings with State Vocational Rehabilitation (VR) agencies and other organizations that work with people with disabilities, such as CUNY LEADS, Job Path, etc.
   c. Providing tools and technology that are accessible to all employees, such as the availability of access technology (magnification, voice recognition, screen readers, etc.).
   d. Creating an affinity group/employee resource group (ERG) for people with disabilities (*if enough employees express interest to join in alignment with ERG creation charter of a minimum of three employees).
   e. Providing internship and fellowship opportunities for people with disabilities through programs such as the Partnership for Inclusive Internships.
   f. Purchasing first aid kits for guide dogs and placing them in a readily available area of the physical office space.
3. **Timeline**
   a. 3 years
   b. 1 year
   c. 5 years
   d. 2 years

e. 3 years
        f. 2 years
    4. **Roles and Responsibilities**
        a. The Equal Employment Opportunity / Diversity, Equity, and Inclusion division of the CFB.
        b. The People Operations division of the CFB.
    5. **Outcome Tracking**
        a. We will track any changes and improvements made to workplace inclusion through our internal accessibility plan tracking system, which was made with Excel.

Methodology

This 5-year accessibility plan was developed by members of the CFB Equal Employment Opportunity / Diversity, Equity, and Inclusion division. The audit that helped inform this plan was conducted by the Kirann Nesbit, our Disability Service Facilitator (DSF) / Digital Inclusion Officer (DIO). The audit was conducted using documents provided by the Mayor's Office for People with Disabilities (MOPD).

Although no persons with disabilities were consulted directly during the audit process, all CFB employees have been given the opportunity to speak with, both directly and/or indirectly, with our DSF/DIO about access issues that they may be facing.

Additionally, any issues, discrepancies, areas of non-compliance, etc. that were made visible through those communications are reflected in this report in conjunction with the audit results.

Once our plan goes through the public comment process with partners in the disability community, we will implement all valuable input into our plan before beginning its implementation.

Additional Headings

Glossary

Digital access: Digital access refers to providing individuals with disabilities access to the information or data involved by an alternative media, format, or technology that allows the individual to use the information or data.

Communication access: Communications access refers to the concept that people with sensory disabilities can communicate (and be communicated with) on an equal footing with those who do not have such disabilities.

Programmatic access: Programmatic access refers to an organization's policies and practices do not create barriers to inclusion. Eliminating programmatic barriers, such as communication and sensory barriers, creates programmatic accessibility.

Physical access: Physical access refers to the design and layout of buildings, outdoor environments, and products to make them usable by people with disabilities, particularly those with mobility impairments.

Workplace inclusion: Workplace inclusion based on disability refers to an inclusive workplace that values all employees for their strengths. It offers applicants, visitors, and employees with disabilities, whether visible or invisible, an equitable opportunity to succeed, to learn, to be compensated fairly, and to advance.

Budget and Resource Allocation

The CFB will make available monies/funds within our budget to accommodate all accessibility initiatives/acquisition of necessary services and equipment.

The CFB regularly reviews our personnel services budget and will make adjustments to accommodate the anticipated personnel needs to accomplish the actions listed in this plan. In a concerted effort to meet these goals, our current plan includes the addition of one accessibility coordinator to the EEO/DEI division. If the needs of the CFB's accessibility measures exceed that of the EEO/DEI division's capacity, further consideration will be given to expand the headcount.

Training

Currently, the Equal Employment Opportunity/Diversity, Equity, and Inclusion division of the CFB requires each new employee to enroll in and pass "Disability Awareness and Etiquette" training within their first 30 days of employment. Henceforth, the EEO/DEI division will provide updated disability training on a regular basis with similar enrollment and completion requirements. In addition to this updated training, the division will continuously communicate CFB employees on (1) accessibility resources availability, (2) updates to the CFB accessibility policies and practices, and (3) spontaneous furthering-education offerings, such as trainings, resources, and information.