# National Federation of the BlindAffiliate Accessibility Policy GuidanceInternal (Non-Employment)

*Revised October 2017
Updated December 2, 2023*

On a national level, the National Federation of the Blind has adopted the following accessibility policy:

The National Federation of the Blind does not discriminate on the basis of disability and holds itself to the highest standards of inclusion in all our work. We hope this value is evident in all of our interactions with members, partners, guests, professionals in the field of blindness, policy makers, and the general public. If you encounter any disability-related barriers or have suggestions for how we can improve accessibility, please let us know.

To that end, we are committed to providing physical access, reasonably modifying our practices, and providing auxiliary aids and services when needed to ensure equal access to our facilities, activities, and services. If you need any accessibility feature, modification, or auxiliary aid, please let us know as early as possible so we can make any needed arrangements.

We are also committed to ensuring that our communications, including our website, are accessible to people with disabilities. We seek to ensure that all the pages on our website are designed to meet W3C Web Content Accessibility Guidelines (WCAG) 2.1, Level AA conformance. We review our website periodically to check and improve accessibility, and we favor third-party web content and technology providers based on their accessibility. If you face any barriers on our website or in other Federation communication channels, please do not hesitate to let us know so we can take corrective action immediately.

To make accessibility-related requests or report barriers, please contact Sanho Steele-Louchart at ssteele-louchart@nfb.org or 410-659-9314, extension 2440.

The National Federation of the Blind’s (NFB) affiliates likewise seek to offer the highest levels of disability inclusion to our members, participants in our events and activities, and members of the public. We strive to meet and exceed the requirements of the Americans with Disabilities Act (ADA) to make our members and all people with disabilities feel welcome and have equal access to our programs and activities. To that end, NFB affiliates should work to address accessibility requests in advance whenever possible, to be flexible, and to respond quickly when a request for accessibility is made. The NFB and NFB affiliates do not charge our members, participants, or members of the public for the extra cost of disability-related accommodations. We encourage affiliate leaders, staff, and members to participate in training on accessibility and to have processes in place for receiving and responding to requests for accommodations.

The NFB’s ADA point of contact, Sanho Steele-Louchart, can answer questions or concerns from affiliates about accessibility. He can be reached at ssteele-louchart@nfb.org or 410-659-9314, extension 2440.

## Procedures

Affiliates should be prepared to respond to requests for accommodation, physical accessibility, or effective communication from members, participants, and members of the public. Affiliates should have a point of contact to whom participants can request accommodations, a means of notifying participants about how to reach the point of contact, and a process for responding and approving or disapproving accommodations. Affiliates should also do research and identify accommodations providers in their area (such as sign language interpreters, tactile interpreters, CART providers, and portable ramp/lift rentals).

* Point of Contact**:** Each affiliate should have a person designated to receive and respond to requests.
* Notification:The point of contact’s contact information should be publicized in affiliate materials (e.g., the website, event invitations), along with information about how requests for accommodation should be made, and any advance notice requirements.
	+ Affiliates should not make the process of requesting accommodations burdensome. Providing means for making requests by email and phone is usually sufficient.
	+ Affiliates should inform participants of any information they need in order to respond to a request for accommodation, such as the requester’s contact information and any advance notice requirements for particular accommodations.
	+ Affiliates should not set unnecessarily early deadlines for accommodation requests. Generally three to five days is sufficient notice to arrange an accommodation, but it will depend on the providers in your area.
	+ An affiliate cannot deny an accommodation just because the requester did not meet the advance notice deadline. The affiliate must still see if the accommodation can be provided or if an alternative can be provided.
* Process:Each affiliate should have a process for receiving accommodation requests, responding to requesters, and approving and providing accommodations, with clear designation of authority and responsibility. If the point of contact is not the final decisionmaker, the point of contact should have ready access to the decisionmaker and a clear understanding of what information the decisionmaker needs from the point of contact, such as cost information.
* Response:It is important to engage with the requester in an interactive process to ensure the final accommodation will be reasonable and effective, and to notify the requester of whether the request is approved. Affiliates’ processes should require the point of contact to respond to the requester in as timely a manner as possible, usually within two business days, to begin the interactive process.
	+ The interactive process should include discussing with the requester the precise nature of the access barrier that is generating the request, how a disability is prompting the need for the accommodation, and any alternative accommodations that may be effective in meeting the requester’s needs. The process should also include a genuine attempt to reach agreement between requester and the affiliate on what accommodation is appropriate.
* Confidentiality: An affiliate should not publicly reveal a requester’s disability information or request. It may be unlawful to reveal individual disability information. For example, telling other NFB members that a meeting had to be moved “because Joe Requester needed an accessible venue” is not appropriate or acceptable and could subject the affiliate to liability. Confidential information should be disclosed only to people who need to know.
* Accommodation Provider List: Each affiliate should have a list of accommodation providers in their area, such as sign language interpreter services, portable ramp or lift rentals, tactile interpreters, and CART and captioning providers. Each affiliate should know how much advance notice these providers need for requests for services, their costs, and how to request services from them. Having this information will allow the affiliate to set advance notice requirements for accommodation requests. [NOTE: Even if a request is received after the general advance notice deadline, an affiliate should still try to provide the accommodation.] If feasible, an affiliate should have contracts in place for commonly used accommodations so the administrative process of setting up an account or contract will not delay accommodations.

## Accommodations Guidelines

* When to Provide an Accommodation**:** If a person requesting an accommodation has a disability (this is a fairly low standard and generally affiliates should not assume a person does not have a disability if they report that they do) and the requested accommodation is related to the disability, that is generally sufficient to create an obligation to consider providing the accommodation.
	+ However, an NFB affiliate is not necessarily required to provide the specific accommodation that is requested if another accommodation will provide equal access. It is important to talk to the requester to explain what will happen at the event or activity and ask about other options for accommodations.
		- For example, if an NFB affiliate has already arranged CART for an event and another participant requests an interpreter, in the absence of unusual circumstances (such as that the requester does not read English), providing CART may be sufficient.
		- For example, if an NFB affiliate is having an informal gathering without speeches and a participant requests CART, the affiliate may need to explain to the requester that CART will not be effective and arrange a different accommodation, such as an interpreter.
	+ It is required to give the requester’s request for an accommodation “primary consideration,” meaning the person’s requested accommodation should be provided unless an equally effective accommodation is provided or the requested accommodation would constitute an undue burden or fundamental alteration of the program.
	+ If an alternative accommodation will provide equal access or equally effective communication in the particular situation, it is sufficient to meet the requirements of the ADA and related laws, even if it is not the accommodation requested by the participant.
* Physical Accessibility: Office and meeting space owned or rented by the NFB affiliate should be assessed for accessibility and the affiliate should improve accessibility on an ongoing basis.
	+ Affiliates should make every effort to hold conventions and official meetings in fully accessible locations. Affiliates should consult with their meeting space providers about how accessible any facility is, advocate with the provider to increase accessibility, and consider moving to more accessible space if reasonably available.
	+ If meeting space is not accessible, affiliates should make temporary accessibility measures, such as renting portable ramps or lifts, using traffic cones to designate accessible parking spaces, blocking open heavy doors, providing assistance opening doors, and moving furniture to increase accessibility. If a person with a disability requiring physical access is planning to attend an event and part of the facility is inaccessible, the affiliate should try to move the sessions the person plans to attend to the accessible part of the facility (i.e., if multiple meetings or sessions are taking place at the same time).
	+ If an affiliate is using space for an event or meeting that is not accessible, make sure the invitation includes information on how to request accessibility. If the affiliate receives a request for physical accessibility, it should be prepared to move the event to accessible space or provide temporary accessibility on request.
	+ For official events other than conventions where members meet in public spaces (such as restaurants), affiliates should ask the management if their facility is accessible (including entrances, seating areas, and restrooms), request to be seated in accessible areas if people with mobility disabilities are planning to attend, and seek more accessible space if reasonably available if people with mobility disabilities are planning to attend.
	+ As a result of the COVID-19 pandemic, nearly all NFB activities went virtual and were almost exclusively held on the Zoom platform. There is no doubt that virtual offerings will remain a permanent feature of Federation events. Therefore, affiliates should attempt to provide CART or live closed captioning for virtual meetings, especially major meetings such as state conventions, etc.
* Undue Burden or Fundamental Alteration: An NFB affiliate does not need to provide an accommodation if the request would create an undue burden on the affiliate or would fundamentally alter the activity.
	+ Undue burden includes both financial and administrative burdens.
		- Financial burden is based on all the resources available to the affiliate, including its annual budget, not just the budget for a particular event. The fact that the cost of an accommodation may exceed the ticket price for a particular event does not mean it is an undue burden for the affiliate.
		- Administrative burden is based on all the staff and volunteer resources available to the affiliate. Generally, it would not be sufficient for an affiliate to reject an accommodation request simply because it would need to assign a staff person or volunteer to provide the accommodation. However, if an accommodation would significantly disrupt the affiliate’s ability to do its business or conduct the activity, it might be an undue burden.
	+ If an affiliate decides to reject an accommodation request based on undue burden or fundamental alteration, the affiliate should consult with the NFB ADA coordinator for advice before communicating the rejection.
	+ Before an affiliate rejects an accommodation request based on undue burden or fundamental alteration, the affiliate president should consider the resources of the affiliate and document the basis for her or his conclusion that providing the accommodation will be an undue burden or fundamental alterations. The president of the affiliate must document, in writing, the cost of the requested accommodation, the total budget of the affiliate, and why the cost of the accommodation constitutes an undue burden.
	+ If an affiliate rejects an accommodation request based on undue burden or fundamental alteration, the affiliate still has to provide any accommodations that would not create an undue burden or fundamental alteration. For example, if an affiliate determines that its budget cannot cover the cost of a sign language interpreter or CART for an event, the affiliate likely still has to provide a written transcript of prepared speeches and a notetaker to write down unscripted conversations.
* Priorities:In order to ensure that resources are appropriately prioritized for accommodations at the most important NFB events and activities, affiliates should plan for accommodations and prioritize providing accommodations to ensure they have sufficient resources for the most important events. Therefore, affiliates should include funds in their budgets for the provision of such accommodations.
	+ Accommodations for attendees and guests attending official events at state conventions: because conventions are the heart of self-governance for NFB affiliates, ensuring full participation by all attendees in official events is essential.
	+ In some circumstances, accommodations should also be made for attendees attending unofficial affiliate meetings and events if reasonable.
* Information Collection: In order to identify possible ways to share resources or reduce costs (such as purchasing portable equipment that affiliates often rent), affiliates should collect information on the types of accommodations they provide and the costs of those accommodations and share that information with the NFB ADA point of contact.

More in-depth information about accommodations is available at [www.ada.gov](http://www.ada.gov) or <http://cct.org/wp-content/uploads/2015/08/2015ADAComplianceGuide.pdf>.