**Statement on Draft FY22-26 Operating & Financial Plan and Draft FY22 Operating Plan & Budget**

**From Judith Hellerstein—At Large Member**

Thanks for the opportunity to comment on the draft budget and operational plan for FY22 and FY22-FY26. I offer my congratulations the finance team, for the continuous improvement over the operational plan and budget, also for including some of the comments received in previous years, as the inflation adjustments, and the income forecasts.

As suggested by Victoria Yang and the Planning Team, I am submitting these public comments on several accessibility issues I have found with the documents that were submitted as well as with other documents that ICANN Org submits for Public Comments and for general use.

**ACCESSIBILITY ISSUES**

I am requesting that Planning and Finance be more mindful of accessibility issues when posting documents. For example after reading the reports, I have noticed that several of the tables contained in the PDF documents were not posted as actual tables but as images. When Tables are posted as images it poses all sorts of accessibility challenges for peoples who are blind or low vision and who use screen readers to read these documents. ICANN should ensure that they follow the Web Accessibility Guidelines established by the World Wide Web Consortium (W3C) and the Web Content Accessibility Guidelines, WCAG 2.0 or later, <https://www.w3.org/TR/UNDERSTANDING-WCAG20/> .

Many of the figures and tables used in the document do not contain ALT text describing the table or figures so that a person who is blind or has low vision and uses a screen reader can read these documents. Word, Excel, Adobe or any other software allows ALT text to be added to describe the image or table to the reader. This ALT text indicates to people using screen readers what this table, photo, image is all about. Otherwise the Screen reader will just pick up the word Image or say a chart or table with figures which is not helpful. Many of the figures and tables used in the document do not contain ALT text describing the table or figure.

In Word or Excel  you can right click on the image and you can select Edit ALT text to describe it or use Picture Format in Word and select Alt Text to input your description this way the screen readers will know what the photo or image is about and explain it.

After noticing this I decided to use the simple Accessibility checker that Adobe Acrobat has installed to check on other accessibility issues within these documents that I had not noticed on first glance. Several other accessibility issues came to the floor following this review. One of the main issues that came out was the failure to focus any attention on ensuring that there is a proper color contrast. Many people who are color blind or have other disabilities have trouble differentiating between certain colors

**Color contrast** is a common web accessibility issue that is often overlooked. People who may have low vision, or may be colorblind, could encounter some difficulty distinguishing text from a background color if the contrast is insufficient. There are nearly three times more individuals with low vision than those with total blindness; and one out of twelve people has some sort of color deficiency. So, it is critical to consider adequate contrast between text and backgrounds.

When text contrasts poorly with its background, it makes reading more difficult, especially for people with low vision. The same goes for icons and situations where highlighting is used to draw attention (such as the hover effects on links). It is a good idea to ensure that the contrast ratio between text color and background color is at least 4.5:1. There are color-contrast tools that can help you test color pairs for contrast and adjust the values as necessary.

**Avoid very high contrast**. Be aware also that for some people, especially people with dyslexia, a very high contrast color scheme can make reading more difficult. It’s a good idea to choose an off-white background color rather than a white background to aid on-screen reading. Text and background color combinations on the page should be verified by using a [color contrast checking tool](https://accessibility.huit.harvard.edu/tools): Is the contrast ratio at least 4.5:1 (or 3:1 for large text)?

For Level AA conformance, WCAG 2.0 Success Criterion 1.4.3 recommends that regular text has a minimum contrast ratio of 4.5:1 and that large text (18-point or 14-point bold) has a minimum contrast ratio of 3:1. The ratios have been scientifically calculated to ensure that text can be read by those with moderate low vision and that contrast is sufficient enough for those who have color deficiencies. A common question web designers have when addressing color contrast is what colors to avoid. It is not so much about avoiding colors as much as it is about ensuring that colors used in web design have appropriate contrast. <http://www.w3.org/TR/UNDERSTANDING-WCAG20/visual-audio-contrast-contrast.html>

**There is also a lack of any Accessible Bookmarks.** These bookmarks help people using screen readers access different pages and topics covered in the report. Adobe’s accessibility checker stated that the documents lacked these features.

**Headers**.  Many headers in the tables and charts used are not accessible and these are critical to people with disabilities using screen readers to understand these charts, figures, and tables.

**Tab order**. Because tabs are often used to navigate a PDF, it's necessary that the tab order parallels the document structure.

**Logical reading order**. Make sure that the reading order displayed in the Tags panel coincides with the logical reading order of the document.

**Document language**. Setting the document language in a PDF enables some screen readers to switch to the appropriate language. This check determines whether the primary text language for the PDF is specified. If the check fails, set the language.

**Titles**: Correctly adding titles to Acrobat’s title bar is key to helping people with screen readers navigate the document.

Thanks for the opportunity to comment on the draft budget and operational plan for FY22 and FY22-FY26.