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# City of New York

## OFFICE OF THE COMPTROLLER

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## FINANCIAL AUDIT

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Audit Report on the Twelve Bronx  
Community Boards' Compliance with  
New York City Charter and New York  
City Administrative Code Requirements  
for Public Meetings and Hearings, and  
for Websites

FK21-072A

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## THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER FINANCIAL AUDIT

### Audit Report on the Twelve Bronx Community Boards' Compliance with New York City Charter and New York City Administrative Code Requirements for Public Meetings and Hearings, and for Websites

FK21-072A

#### EXECUTIVE SUMMARY

Community Boards are established under the New York City Charter (City Charter) Chapter 70, Section 2800(a), which states that “[f]or each community district . . . there shall be a community board.” The Community Boards are local representative bodies authorized by the City Charter to advocate for the residents and needs of their districts. New York City (the City) is divided into 59 community districts, each served by a Community Board.

Several City agencies are responsible for assisting the Community Boards in fulfilling their overall responsibilities, including the respective Borough Presidents, the Civic Engagement Commission, and the Mayor’s Office Community Affairs Unit.

Each Community Board comprises up to 50 non-salaried members, each of whom must reside, work, or have some other significant interest in the district. One of the Community Board members is elected by the other members to serve as the Chairperson. In addition, each Community Board appoints a District Manager and may employ other staff and consultants to fulfill its duties, all of whom are paid by the City. Each Community Board is allocated funds through the City budget to cover staff salaries and non-salary expenses, including rent, utilities, and other miscellaneous expenses.

The Bronx has 12 Community Boards that collectively cover the entire borough.

#### Audit Findings and Conclusions

The Bronx Community Boards generally complied with the City Charter requirements to set aside time to hear from the public at public meetings and to maintain a website which provides board contact information.

However, our audit found that not all of the 12 Bronx Community Boards complied with the City Charter requirements relating to public meetings and hearings and to maintaining websites. Specifically, we found that none of the 12 Bronx Community Boards consistently conducted

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monthly public hearings, and that certain Bronx Community Boards did not consistently conduct monthly general board meetings, did not set aside time to hear from the public before the board took actions such as votes during meetings, did not provide required adequate public notice for meetings and hearings by notifying media outlets and posting notices in physical public locations and on their websites, did not make meetings and hearings available for broadcasting and cablecasting, and did not publish past meeting minutes on their websites.

Additionally, our audit found that not all of the Bronx Community Boards fully complied with New York City Administrative Code (NYC Administrative Code) requirements relating to maintaining websites. Specifically, some Bronx Community Boards did not consistently maintain websites that are translatable into the seven most commonly spoken languages in New York City, and did not maintain websites which were fully accessible for persons with disabilities.

For the majority of findings discussed in the report, the Bronx Community Board officials informed us that the main reasons they are not in compliance are a lack of: (1) guidance, instructions, assistance, and support from the other City agencies that are responsible for assisting the Community Boards; and (2) financial and professional resources necessary to fulfill the requirements.

## Audit Recommendations

Based on our findings, we made the following eight recommendations to the Bronx Community Boards. The Bronx Community Boards should:

- Conduct public hearings each month in accordance with the New York City Charter Chapter 70, Section 2800(h) and, if necessary, seek guidance on how to comply with this requirement by contacting the New York City Law Department as well as the other City agencies tasked with providing assistance to the Community Boards—the Bronx Borough President’s Office, the Civic Engagement Commission, and the Mayor’s Office Community Affairs Unit;
- Set aside time to hear from the public prior to taking actions at meetings and hearings;
- Ensure that public notice of all general board meetings is given to news media outlets and posted in public locations;
- Ensure that public notice of all public hearings is published in the official newspaper or in a newspaper having general circulation within the municipality and posted in public locations and includes the date, time and place of the hearing, and a brief statement of the purpose of the hearing;
- Take the necessary steps to ensure that all meetings and hearings are made available for broadcasting and cablecasting, including but not limited to, determining how to obtain access to channels dedicated for governmental use, identifying the associated costs, and allocating or seeking the necessary resources to comply with the City Charter mandate;
- Provide adequate public notice of upcoming meetings on their websites and include information such as the date, time, and location of the meeting as well as the internet address of the website streaming such meeting if applicable;
- Post meeting minutes from meetings for the past 12 months on their websites; and

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- Contact DoITT and website platform vendors to ensure that their websites include a translation feature that allows the text of their website to be viewed in the seven most commonly spoken languages in the City and are fully accessible to persons with disabilities as per the WCAG 2.0 Level AA standard.

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## AUDIT REPORT

### Background

Community Boards are established under the City Charter Chapter 70, Section 2800(a), which states that “[f]or each community district . . . there shall be a community board.” The Community Boards are local representative bodies authorized by the City Charter to advocate for the residents and needs of their districts. The City is divided into 59 community districts, each served by a Community Board.

Under Chapter 70, Section 2800(d) of the City Charter, Community Boards are responsible for, among other things:

- Considering the needs of the district;
- Preparing and submitting to the Mayor an annual statement of community district needs, capital budget priorities, expense budget priorities, and recommendations and priorities on the allocation and use of funds earmarked for community development activities under City, State, or federal programs;
- Preparing comprehensive and special purpose plans for the growth, improvement, and development of the community district;
- Assisting with capital project planning;
- Vetting land use and zoning proposals; and
- Assisting City departments and agencies in communicating with and transmitting information to the people of the district.

Several City offices are responsible for assisting the Community Boards in fulfilling their overall responsibilities. Under the City Charter, the respective Borough President is responsible for appointing Community Board members for two-year terms and providing training and technical assistance to the Community Boards within the borough. The City Charter also states that “[s]ubject to appropriation, the [C]ivic [E]ngagement [C]ommission shall provide assistance and training to community boards . . . which may include but need not be limited to assistance in utilizing technological tools and assistance in developing uniform meeting procedures.” Additionally, the Mayor’s Office Community Affairs Unit is responsible for assisting Community Boards in carrying out their Charter-mandated responsibilities and coordinating City policies that relate to the Community Boards.

Each Community Board comprises up to 50 non-salaried members, each of whom must reside, work, or have some other significant interest in the district. One of the Community Board members is elected by the other members to serve as the Chairperson. In addition, each Community Board appoints a District Manager and may employ other staff and consultants to fulfill its duties, all of whom are paid by the City.

Community Boards are allocated funds through the City budget to cover staff salaries and non-salary expenses, such as rent, utilities, and other miscellaneous expenses. Table I below provides a breakdown of the total budget allocated for each Bronx Community Board for Fiscal Years 2019,

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2020, and 2021 and Table II below provides a breakdown of each Community Boards staffing level as of September 30, 2021.

**Table I**

Total Budget Allocations for Each  
Bronx Community Board (CB)

<b>Bronx Community Board</b>	<b>Fiscal Year 2019</b>	<b>Fiscal Year 2020</b>	<b>Fiscal Year 2021</b>	<b>Percentage Change in Budget Allocation from FY19 to FY21</b>
CB1	\$ 353,546	\$ 358,334	\$ 310,976	-13.7%
CB2	\$ 344,072	\$ 349,956	\$ 342,567	-0.4%
CB3	\$ 352,052	\$ 357,744	\$ 311,861	-12.9%
CB4	\$ 301,866	\$ 305,386	\$ 248,300	-21.6%
CB5	\$ 289,047	\$ 293,567	\$ 237,781	-21.6%
CB6	\$ 288,364	\$ 292,884	\$ 245,167	-17.6%
CB7	\$ 349,140	\$ 353,436	\$ 306,633	-13.9%
CB8	\$ 346,968	\$ 349,522	\$ 303,954	-14.2%
CB9	\$ 358,536	\$ 399,670	\$ 442,266	18.9%
CB10	\$ 361,202	\$ 365,632	\$ 317,623	-13.7%
CB11	\$ 347,123	\$ 352,648	\$ 305,144	-13.8%
CB12	\$ 293,567	\$ 300,409	\$ 254,554	-15.3%

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**Table II**

Total Staffing Level for Each Bronx  
Community Board (CB) as of  
September 30, 2021

<b>Bronx Community Board</b>	<b>District Managers</b>	<b>Assistant District Managers</b>	<b>Community Coordinators</b>	<b>Community Associates/ Assistants</b>	<b>Total Board Staff</b>
CB1	0	0	1	0	1
CB2	1	0	1	1	3
CB3	0	1	0	0	1
CB4	1	0	0	2	3
CB5	1	0	1	1	3
CB6	1	0	1	1	3
CB7	1	0	1	1	3
CB8	1	0	1	1	3
CB9	1	1	0	1	3
CB10	1	0	0	4	5
CB11	1	0	2	0	3
CB12	1	0	1	0	2

The Bronx has 12 Community Boards that collectively cover the entire borough. Table III below lists the neighborhoods served by each of the Bronx Community Boards, and the Illustration that follows provides a map of the Bronx community districts.

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**Table III**

Neighborhoods Served by Each  
Bronx Community Board (CB)<sup>1</sup>

<b>Bronx Community Board</b>	<b>Neighborhoods Served</b>
CB1	Melrose, Mott Haven, Port Morris
CB2	Hunts Point, Longwood
CB3	Claremont, Crotona Park East, Melrose, Morrisania
CB4	Concourse, Concourse Village, East Concourse, Highbridge, Mount Eden
CB5	Fordham, Morris Heights, Mount Hope, University Heights
CB6	Bathgate, Belmont, Bronx Park South, East Tremont, West Farms
CB7	Bedford Park, Fordham, Kingsbridge Heights, Norwood, University Heights
CB8	Fieldston, Kingsbridge, Marble Hill (MN), North Riverdale, Riverdale, Spuyten Duyvil
CB9	Bronx River, Castle Hill, Clason Point, Harding Park, Parkchester, Soundview, Soundview-Bruckner, Unionport
CB10	City Island, Co-op City, Country Club, Edgewater Park, Pelham Bay, Schuylerville, Throgs Neck, Westchester Square
CB11	Allerton, Bronxdale, Indian Village, Morris Park, Pelham Gardens, Pelham Parkway, Van Nest
CB12	Baychester, Eastchester, Edenwald, Olinville, Wakefield, Williamsbridge, Woodlawn

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<sup>1</sup> Source: The New York City Department of City Planning Community District Profiles. Some neighborhoods may be in multiple districts.

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## Illustration

### Map of Bronx Community Districts<sup>2</sup>

#### COMMUNITY DISTRICT (CD) MAP: BRONX



<sup>2</sup> Source: The New York City Community Boards Handbook 2015.

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## Objectives

The objectives of this audit were to determine whether each of the 12 Bronx Community Boards complied with:

(1) The New York City Charter Chapter 70, Section 2800(h), which requires Community Boards to meet and hold public hearings at least once per month (except for the months of July and August), to give adequate public notice for meetings and hearings, to make meetings and hearings available for broadcasting and cablecasting, and to set aside time for the public to speak at meetings;

(2) The New York City Charter Chapter 70, Section 2800(d)(22), which requires Community Boards "[w]ith assistance and support from the department of information technology and telecommunications, [to] maintain a website that provides adequate public notice of upcoming meetings, minutes from past meetings for the past twelve months, and contact information for the board";

(3) The New York City Administrative Code, Section 23-801, which states that "[e]very website maintained by or on behalf of the city or a city agency shall include a translation feature for viewing the text of that website, wherever practicable, in . . . the seven most commonly spoken languages within the city"; and

(4) The New York City Administrative Code, Section 23-802(a), which states that "[t]he mayor or the mayor's designee shall adopt a protocol for websites maintained by or on behalf of the city or a city agency relating to website accessibility for persons with disabilities."

## Scope and Methodology Statement

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

This audit covered the period of June 1, 2019 through September 30, 2021. Please refer to the Detailed Scope and Methodology at the end of this report for the specific procedures and tests that were conducted.

## Discussion of Audit Results

The matters covered in this report were discussed with officials from each of the Bronx Community Boards during and at the conclusion of this audit. A preliminary draft report was sent to the Bronx Community Boards and discussed at an exit conference on November 8, 2021. We are submitting this draft report to the Bronx Community Boards with a request for written comments. The comments received will be included in the final version of this report.

## FINDINGS AND RECOMMENDATIONS

The Bronx Community Boards generally complied with the City Charter requirements to set aside time to hear from the public at public meetings, and to maintain a website which provides board contact information.

However, our audit found that not all of the 12 Bronx Community Boards complied with the City Charter requirements relating to public meetings and hearings and to maintaining websites. Specifically, we found that none of the 12 Bronx Community Boards consistently conducted monthly public hearings, and that certain Bronx Community Boards did not consistently conduct monthly general board meetings, did not set aside time to hear from the public before the board took actions such as votes during meetings, did not provide adequate public notice for meetings and hearings by notifying media outlets and posting notices in physical public locations and on their websites, did not make meetings and hearings available for broadcasting and cablecasting, and did not publish past meeting minutes on their websites.

Additionally, our audit found that not all of the Bronx Community Boards fully complied with NYC Administrative Code requirements relating to maintaining websites. Specifically, some Bronx Community Boards did not consistently maintain websites that are translatable into the seven most commonly spoken languages in New York City, and did not fully adopt the protocols required to make their websites accessible for persons with disabilities.

These findings are discussed in the following sections of the report. For the majority of findings discussed in the report, the Bronx Community Board officials informed us that the main reasons they are not in compliance are a lack of: (1) guidance, instructions, assistance, and support from the other City agencies that are responsible for assisting the Community Boards; and (2) financial and professional resources necessary to fulfill the requirements.

### **Bronx Community Boards Did Not Fully Comply with City Charter Requirements for Public Meetings and Public Hearings**

#### **Boards Did Not Consistently Conduct Monthly General Board Meetings and Public Hearings**

Section 102(1) of the Open Meetings Law defines a meeting as “the official convening of a public body for the purpose of conducting public business.” Furthermore, Section 109 of the Open Meetings Law states that “[t]he committee on open government . . . shall issue advisory opinions from time to time as, in its discretion, may be required to inform public bodies and persons of the interpretations of the provisions of the open meetings law.” The New York State Department of State, Committee on Open Government, Open Meetings Law, Advisory Opinion #3834 defines “meetings” and “hearings” to differentiate the purpose and function of each:

A meeting is different from a hearing. A meeting is generally a gathering of quorum of a public body for the purpose of discussion, deliberation, and potentially taking action within the scope of its powers and duties. A hearing is generally held to provide members of the public with an opportunity to express their views

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**concerning a particular subject**, such as a proposed budget, a local law or a matter involving land use. [Emphasis added.]

The New York State Division of Local Government Services guidance titled “Conducting Public Meetings and Public Hearings” also states that public hearings are held to allow the public to speak on particular matters as follows:

A public hearing is an official proceeding of a governmental body or officer, during which the public is accorded the right to be heard. . . . Many public hearings are required by law **on particular matters**, such as those that must be held prior to adoption of a local law, or prior to a determination by a planning board . . . . Many others need only be held at the option of a public body, because it may desire merely to gauge public opinion **on a matter**. [Emphasis added.]

Per Chapter 70, Section 2800(h) of the City Charter, Community Boards are required to hold both a meeting and a public hearing each month except July and August: “Except during the months of July and August, each community board shall meet at least once each month within the community district **and conduct at least one public hearing each month.**” [Emphasis added.] The City Charter states that each Community Board shall hold public hearings on matters affecting the district including (1) capital needs and departmental estimates, (2) expense budget needs and estimates, (3) the allocation and use of funds earmarked for community development activities under City, State, or federal programs, (4) the Citywide statement of needs which identifies City facilities which the City intends to open, expand, close, or significantly reduce in size or service capacity, and (5) public agencies’ and private entities’ applications and proposals for the use, development, or improvement of land. Further, the City Charter states that each Community Board shall, at its discretion, hold public hearings on any matter relating to the welfare of the district and its residents.

However, based on our review of general board meeting minutes for the period September 2019 through November 2020, 8 of the 12 Bronx Community Boards did not consistently hold monthly general board meetings as detailed in Table IV below (Bronx Community Boards #1, #2, #4, #7, #9, #10, #11, and #12).

Additionally, based on our review of public hearing minutes for the period September 2019 through November 2020, all 12 Bronx Community Boards failed to conduct at least one public hearing each month as detailed in Table V below. Furthermore, 3 of the 12 Bronx Community Boards did not conduct *any* public hearings (Bronx Community Boards #2, #9, and #12).

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## Table IV

Analysis of Monthly General Board Meetings for the Period September 2019 through November 2020<sup>3</sup>

Month	General Board Meeting Held (Yes/No)											
	CB1	CB2	CB3	CB4	CB5	CB6	CB7	CB8	CB9	CB10	CB11	CB12
September 2019	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
October 2019	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
November 2019	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
December 2019	No	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No	No
January 2020	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
February 2020	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No
March 2020	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
April 2020	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
May 2020	No	No	Yes	No	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
June 2020	Yes	Yes	Yes	No	Yes	Yes	No	Yes	No	Yes	Yes	Yes
July 2020	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
August 2020	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
September 2020	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
October 2020	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
November 2020	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>Total Meetings Conducted</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>8</b>	<b>11</b>	<b>11</b>	<b>10</b>	<b>11</b>	<b>8</b>	<b>10</b>	<b>10</b>	<b>9</b>
<b>Total Meetings Not Conducted</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>3</b>	<b>1</b>	<b>1</b>	<b>2</b>

<sup>3</sup> As previously stated, Community Boards are not required to hold public meetings and hearings in the months of July and August. Therefore, we excluded the months of July 2020 and August 2020 from our analysis. Additionally, due to the COVID-19 pandemic, we judgmentally excluded the months of March 2020 and April 2020 from our analysis. In total, we reviewed 11 months—September 2019 through February 2020, May 2020, June 2020, and September 2020 through November 2020.

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## Table V

Analysis of Monthly Public Hearings  
for the Period September 2019  
through November 2020

Month	Public Hearing Held (Yes/No)											
	CB1	CB2	CB3	CB4	CB5	CB6	CB7	CB8	CB9	CB10	CB11	CB12
September 2019	No	No	No	No	No	No	No	No	No	Yes	No	No
October 2019	No	No	No	Yes	Yes	No	Yes	Yes	No	Yes	Yes	No
November 2019	No	No	Yes	No	No	Yes	No	No	No	No	No	No
December 2019	No	No	No	No	No	No	No	No	No	No	No	No
January 2020	No	No	No	No	No	No	No	No	No	No	No	No
February 2020	No	No	No	No	No	No	No	Yes	No	No	No	No
March 2020	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
April 2020	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
May 2020	No	No	No	No	No	No	No	No	No	No	No	No
June 2020	No	No	No	No	No	No	No	No	No	No	No	No
July 2020	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
August 2020	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
September 2020	No	No	No	No	No	No	No	No	No	No	No	No
October 2020	No	No	No	No	Yes	No	No	Yes	No	Yes	Yes	No
November 2020	Yes	No	Yes	Yes	No	Yes	No	No	No	Yes	No	No
<b>Total Hearings Conducted</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>3</b>	<b>0</b>	<b>4</b>	<b>2</b>	<b>0</b>
<b>Total Hearings Not Conducted</b>	<b>10</b>	<b>11</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>9</b>	<b>10</b>	<b>8</b>	<b>11</b>	<b>7</b>	<b>9</b>	<b>11</b>

Some Community Board officials maintained that they did not conduct public meetings and hearings in March 2020 due to the COVID-19 pandemic and a lack of access to virtual meeting platforms. However, on March 12, 2020, New York State Executive Order 202.1 suspended the portion of New York State law requiring meetings to take place in person, and authorized public meetings to be held virtually. As previously mentioned, we considered the COVID-19 pandemic and judgmentally excluded the months of March and April 2020 from compliance testing. We are aware of no facts that would have prevented Community Boards from obtaining access to virtual meeting platforms by May 2020, since Community Boards were continuously required to meet.

After we presented our findings to the Bronx Community Boards, the Bronx Community Board #12 District Manager stated that with regard to the monthly general board meetings, the board did not meet in February 2020 because of the COVID-19 pandemic, as the board holds their general board meeting on the fourth Thursday of each month, and New York State did not update the virtual meeting requirements until March.

With regard to monthly public hearings, some Bronx Community Board officials stated that the public is afforded the opportunity to speak on any topic during the “public session” at each general board meeting and at committee meetings. Some Bronx Community Board officials stated that the boards hold several committee meetings each month and that the committee meetings in

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some cases could constitute a public hearing because they are discussing particular matters such as liquor license applications and other applications before the board. Specifically, Bronx Community Board #8 provided agendas for several of its committee meetings and stated that “there are many items that come before the Land Use Committee, Traffic & Transportation Committee & Public Safety Committee that require public hearings. For instance, if there is a zoning application, the Land Use Committee holds a public hearing on the item. When there is a liquor license application or renewal, the Public Safety Committee holds a hearing and when there is a traffic proposal or issue there is a public hearing at Traffic & Transportation.”

Additionally, some Bronx Community Board officials stated that holding monthly public hearings may not be practicable because the boards may not have a specific matter to discuss each month and that boards hold public hearings when warranted. Some Bronx Community Board officials also noted that some of the matters they are required to hold public hearings on were suspended during the COVID-19 pandemic, such as Uniform Land Use Review Procedures (ULURP) and liquor license applications.

Lastly, some Bronx Community Board officials stated that boards lack the resources to satisfy this requirement and do not receive training, guidance, and instruction from the agencies that are responsible for assisting them.

However, as previously noted, the City Charter states that, except for the months of July and August, Community Boards are required to “conduct at least one public hearing each month” on matters such as capital needs, expense budget needs, the use of community development funds, city facilities, land use, and other matters relating to the welfare of the district and its residents.

Additionally, the public session portion of a general board meeting, in which the public is invited to share comments and concerns on any matter, does not constitute a public hearing because “[a] hearing is generally held to provide members of the public with an opportunity to express their views concerning a particular subject, such as a proposed budget, a local law or a matter involving land use.”

In regard to committee meetings, while some Bronx Community Boards held committee meetings concerning various topics, the Bronx Community Boards that this report cites as not having conducted a required public hearing each month did not provide evidence that they held topic-specific hearings (during a committee meeting or other meeting) in which the public was given an opportunity to express their views on a particular matter.

In regard to the suspension of ULURP, the Mayor’s Office announced on March 16, 2020, that it was suspending ULURP as a result of the COVID-19 pandemic. However, on July 15, 2020, the Mayor’s Office announced that the ULURP procedures would begin again in August 2020 and the suspension of ULURP would be lifted in September 2020. Specifically, the Mayor’s Office stated that “[t]his staggered restart is aimed at helping ensure that the City’s 59 community boards, which must adhere to ULURP’s timeline but often do not meet during summer months, are ready to host remote public meetings as soon as the clock restarts.” Therefore, since we did not include March and April 2020 in our review because of the COVID-19 pandemic, and the Community Boards are not required to meet in July and August, the only months included in our review which were affected by the suspension of ULURP were May and June 2020.

With regard to Bronx Community Board officials’ assertion that they lack training, guidance, and instruction, the New York State Division of Local Government Services guidance titled “*Conducting Public Meetings and Public Hearings*” notes that “[w]here local officials require guidance on particular public hearing and notice requirements associated with municipal

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business, they should contact the municipal attorney for advice.” Therefore, the Bronx Community Boards should seek advice from the New York City Law Department as well as the other City agencies tasked with providing assistance to the Community Boards to ensure that boards comply with the Charter mandate to hold a public hearing each month.

Since the 12 Bronx Community Boards did not consistently comply with the City Charter requirement to conduct public meetings and hearings at least once per month, the public may not have been informed of and allowed to express their views on issues affecting their district including, among other things, land use and zoning proposals, capital projects, capital budget and expense budget priorities, and programs and services.

### **Three Boards Did Not Set Aside Time for the Public to Speak before the Boards Took Actions during Meetings**

Chapter 70, Section 2800(h) of the City Charter states that “[a]t each public meeting, the board shall set aside time to hear from the public.” Additionally, as previously mentioned, one of the key responsibilities of the Community Boards is to consider the needs of the district. For the September 2020 general board meetings, all of the Bronx Community Boards set aside time to hear from the public. However, we found three Bronx Island Community Boards set aside time to hear from the public after, rather than before, the boards had discussed and voted on matters affecting the district (Bronx Community Board #5, #7, and #11). For example, during the September 2020 general board meetings for Bronx Community Board #5, #7, and #11, prior to hearing from the public, the board members discussed and voted on amendments to by-laws, street renaming, training for board members, and letters in support of various matters affecting the district. Furthermore, these three boards did not hold any public hearings during September 2020 to discuss these matters.

Since Bronx Community Board #5, #7, and #11 did not set aside time to hear from the public before the boards voted, the people of each district may not have been afforded a meaningful opportunity to comment and express their views to the full board, that is, an opportunity to do so before the board voted and took actions on those matters.

### **Most Boards Did Not Provide Adequate Public Notice of Meetings and Hearings**

Chapter 70, Section 2800(h) of the City Charter states that “[e]ach board shall give adequate public notice of its meetings and hearings.” Further, the New York State Public Officers Law, Article 7, Open Meetings Law, Section 104, states that

1. Public notice of the time and place of a meeting scheduled at least one week prior thereto shall be given or electronically transmitted to the news media and shall be conspicuously posted in one or more designated public locations at least seventy-two hours before such meeting.
2. Public notice of the time and place of every other meeting shall be given or electronically transmitted, to the extent practicable, to the news media and shall be conspicuously posted in one or more designated public locations at a reasonable time prior thereto. . . .

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6. When a public body has the ability to do so, notice of the time and place of a meeting given in accordance with subdivision one or two of this section, shall also be conspicuously posted on the public body's internet website.

In addition, the New York State Department of State, Committee on Open Government, Open Meetings Law, Advisory Opinion #4895 states that “[i]n order to comply with the various provisions of the Open Meetings Law, the Board should . . . designate one or more **physical locations** at which it will post notice of the time and place of its meetings.” [Emphasis added.]

However, 8 of the 12 Bronx Community Boards do not provide adequate public notice of general board meetings because they reported that they do not notify news media outlets (Bronx Community Boards #1, #2, #4, and #5) and/or do not post notices in public locations (Bronx Community Boards #1, #2, #3, #4, #5, #6, #10, and #12).

Our audit also found that certain Bronx Community Boards did not provide adequate public notice of public hearings. According to the New York State Department of State guidance titled *Conducting Public Meetings and Public Hearings*, “Legal notice of the hearing should be published in the official newspaper, if there is one, or in a newspaper having general circulation within the municipality, as required by law. A public notice should be posted on the official bulletin board or signboard, and in other places as required by law.” The New York State Division of Local Government Services guidance titled “Conducting Public Meetings and Public Hearings” also details public notice requirements for public hearings and states that “[l]egal notice of the hearing should be published in the official newspaper, if there is one, or in a newspaper having general circulation within the municipality,” and that “all notices of public hearings must, at a minimum, include . . . the date, time and place of the hearing; and . . . a brief statement of its purpose.”

However, of the nine Bronx Community Boards that conducted public hearings, seven did not provide adequate public notice for public hearings because they reported that they do not publish notice of public hearings in the newspaper (Bronx Community Boards #6, and #11), do not post notices in public locations (Bronx Community Boards #3, #4, #5, #6, and #10), or do not provide *any* public notice of public hearings at all (Bronx Community Board #1). Because the remaining three Bronx Community Boards (#2, #9, and #12) did not conduct any public hearings during the 14-month period September 2019 through November 2020, they also did not provide public notice of any such hearings.

After we presented our findings to the Bronx Community Boards, some Bronx Community Board officials stated that they do not have the financial and professional resources to meet this requirement and that the boards are not receiving guidance on these matters from the City agencies that are responsible for assisting them. However, as previously stated, the boards should therefore seek guidance from the City agencies that are responsible for assisting them and identify the associated costs, and allocate or seek the necessary resources to comply with public notice requirements for public meetings and hearings.

Furthermore, some of the Bronx Community Board officials noted that they can send notice of a public hearing to a newspaper but the Community Board does not have control over what the newspaper publishes. However, as previously stated, while the requirement for general board meetings is that public notice should be “given or electronically transmitted to the news media,” the requirement for public hearings is that “[l]egal notice of the hearing should be **published** in the official newspaper, if there is one, or in a newspaper having general circulation within the municipality.” [Emphasis added.]

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Additionally, Bronx Community Board #10 stated that the board “give[s] adequate notice of our meetings every month at the end of each month by our calendar. Our calendars listed all meeting information. . . . This document is also uploaded to our Bronx Community Board #10 Facebook.” However, both the Community Board website and Facebook page do not constitute a public location according to the New York State Open Meetings Law which states that “[i]n order to comply with the various provisions of the Open Meetings Law, the Board should . . . designate one or more **physical locations** at which it will post notice of the time and place of its meetings.” [Emphasis added.]

Since most of the 12 Bronx Community Boards did not consistently provide adequate public notice of meetings and hearings, the public may not have been aware of public meetings and hearings and afforded the opportunity to observe and participate in Community Board discussions, deliberations, and actions, and to express their views concerning issues affecting their district.

## **Most Boards Did Not Make Meetings and Hearings Available for Broadcasting and Cablecasting**

New York City Charter Chapter 70, Section 2800(h), states that “[e]ach board . . . shall make such meetings and hearings available for broadcasting and cablecasting.” Chapter 47, Section 1063(a) of the City Charter states that “[a]ll future cable franchises and franchise renewals shall require (i) that channels be designated for governmental use.”

However, 7 of the 12 Bronx Community Boards reported that they do not make their meetings and hearings available for broadcasting on the radio or on the internet (Bronx Community Boards #1, #4, #5, #7, #8, #9, and #10). The remaining five Bronx Community Boards reported that they broadcast their meetings by livestreaming meetings and hearings on their social media platforms including Facebook and YouTube (Bronx Community Boards #2, #6, and #11) or on cable television (Bronx Community Boards #3 and #12).

Five Bronx Community Boards reported that they were not aware of the City Charter requirement to make meetings and hearings available for broadcasting and cablecasting. After we presented our findings to the Bronx Community Boards, some Bronx Community Board officials stated that they lack the technical expertise and funding to comply with the broadcasting and cablecasting requirements and that they have not been given guidance and instruction from other City agencies, that are responsible for assisting them, in regard to what would constitute broadcasting and cablecasting and how it can be accomplished. Furthermore, some Bronx Community Board officials noted that the Community Boards cannot take any actions without approval and a vote from the board members. However, as previously noted, Chapter 47, Section 1063(a) of the City Charter states that “[a]ll future cable franchises and franchise renewals shall require (i) that channels be designated for governmental use.” The boards should therefore seek guidance from the City agencies that are responsible for assisting them and determine how they can obtain such access, identify the associated costs, and allocate or seek the necessary resources to comply with the City Charter mandate. Since the Bronx Community Boards did not consistently make meetings and hearings available for broadcasting and cablecasting, the public may not have been able to observe Community Board discussions, deliberations, and actions.

Since the Bronx Community Boards did not consistently conduct public hearings, properly notify the public of meetings and hearings, and make meetings and hearings available for broadcasting and cablecasting, the Bronx Community Boards increased the risk that the public may not have been informed of issues affecting their district and thereby limited the public’s ability to participate

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in local government. As stated in the New York State Department of State, Committee on Open Government, Open Meetings Law, Section 100:

The people must be able to remain informed if they are to retain control over those who are their public servants. It is the only climate under which the commonwealth will prosper and enable the governmental process to operate for the benefit of those who created it.

## Recommendations

The Bronx Community Boards should:

1. Conduct public meetings and hearings each month in accordance with the New York City Charter Chapter 70, Section 2800(h) and, if necessary, seek guidance on how to comply with this requirement by contacting the New York City Law Department as well as the other City agencies tasked with providing assistance to the Community Boards—the Bronx Borough President’s Office, the Civic Engagement Commission, and the Mayor’s Office Community Affairs Unit;
2. Set aside time to hear from the public prior to taking actions at meetings and hearings;
3. Ensure that public notice of all general board meetings is given to news media outlets and posted in public locations;
4. Ensure that public notice of all public hearings is published in the official newspaper or in a newspaper having general circulation within the municipality and posted in public locations and includes the date, time and place of the hearing, and a brief statement of the purpose of the hearing; and
5. Take the necessary steps to ensure that all meetings and hearings are made available for broadcasting and cablecasting, including but not limited to, determining how to obtain access to channels dedicated for governmental use, identifying the associated costs, and allocating or seeking the necessary resources to comply with the City Charter mandate.

## Bronx Community Boards Did Not Fully Comply with City Charter and NYC Administrative Code Website Requirements

### Three Boards Did Not Provide Adequate Public Notice of Upcoming Meetings

Chapter 70, Section 2800(d)(22) of the City Charter requires Community Boards to maintain a website “[w]ith assistance and support from the department of information technology and telecommunications [DoITT] . . . that provides adequate public notice of upcoming meetings . . . and contact information for the board.” Further, the New York State Public Officers Law, Article 7, Open Meetings Law, Section 104, states that

5. If a meeting will be streamed live over the internet, the public notice for the meeting shall inform the public of the internet address of the website streaming such meeting.

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6. When a public body has the ability to do so, notice of the time and place of a meeting given in accordance with subdivision one or two of this section, shall also be conspicuously posted on the public body's internet website.

Our audit found that each of the 12 Bronx Community Boards maintained websites which provided board contact information. However, 3 of the 12 Bronx Community Boards did not provide adequate public notice of their September 2021 general board meeting on their websites. Specifically, we found that the website public notice posted by Bronx Community Boards #2 and #10 did not provide the internet address of the website streaming its September 2021 general board meeting, and Bronx Community Board #12 did not post public notice of its September 2021 general board meeting on its website at all.

Since Bronx Community Boards #2, #10, and #12 did not provide adequate public notice of their September 2021 general board meetings on their websites, the public may not have been aware of the meetings and afforded the opportunity to observe Community Board discussions, deliberations, and actions and to express their views concerning issues affecting their district.

### **Most Boards Did Not Always Post Meeting Minutes on Their Websites**

Chapter 70, Section 2800(d)(22) of the City Charter requires Community Boards to maintain a website, “[w]ith assistance and support from [DoITT] . . . that provides . . . minutes from past meetings for the past twelve months.”

However, based on our review of meeting minutes published on the Bronx Community Board websites for the period June 2019 through May 2020, 10 of the 12 Bronx Community Boards did not post all required meeting minutes on their websites, as detailed in Table VI below. Furthermore, three Bronx Community Boards did not post *any* of the required meeting minutes (Bronx Community Boards #2, #3, and #12).

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## Table VI

Analysis of Monthly Meeting Minutes  
Published for the Period June 2019  
through May 2020<sup>4</sup>

Month	Meeting Minutes Published on Bronx Community Board Website (Yes/No)											
	CB1	CB2	CB3	CB4	CB5	CB6	CB7	CB8	CB9	CB10	CB11	CB12
June 2019	Yes	No	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No
July 2019	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
August 2019	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
September 2019	No	No	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No
October 2019	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
November 2019	No	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
December 2019	No Meeting	No	No	No Meeting	Yes	Yes	Yes	Yes	Yes	No Meeting	No Meeting	No Meeting
January 2020	No	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
February 2020	No	No	No	No	No	Yes	No	Yes	No Meeting	Yes	Yes	No Meeting
March 2020	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
April 2020	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
May 2020	No Meeting	No Meeting	No	No Meeting	No	Yes	No	Yes	No Meeting	No	No	No
<b>Total Meetings Conducted</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>6</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>6</b>	<b>7</b>	<b>7</b>	<b>6</b>
<b>Total Minutes Posted</b>	<b>4</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>6</b>	<b>8</b>	<b>5</b>	<b>8</b>	<b>5</b>	<b>6</b>	<b>6</b>	<b>0</b>
<b>Total Minutes Not Posted</b>	<b>2</b>	<b>7</b>	<b>8</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>6</b>

Some Community Board officials stated, without citing specific examples, that DoITT has not dedicated adequate resources to assist the Community Boards with their website and technical needs. Some Community Board officials also informed us that only one DoITT employee is assigned to assist all 59 Community Boards.

After we presented our findings to the Bronx Community Boards, some Bronx Community Board officials stated that the Community Boards send their meeting minutes to DoITT, and DoITT is responsible for posting the minutes on the Community Board websites. Specifically, Bronx Community Board #10 and #11 provided supporting documentation to show that the boards emailed DoITT in June 2020 and requested that DoITT post the May 2020 general board meeting minutes on the Community Board websites.

Furthermore, while not all meeting minutes were posted on the Community Board websites when we conducted our initial review in June 2020, Bronx Community Boards #3, #10, and #11 provided

<sup>4</sup>As previously stated, Community Boards are not required to hold public meetings and hearings in the months of July and August. Therefore, we excluded the months of July 2019 and August 2019 from our analysis. Additionally, due to the COVID-19 pandemic, we judgmentally excluded the months of March 2020 and April 2020 from our analysis. In total, we reviewed 8 months—June 2019, September 2019 through February 2020, and May 2020.

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supporting documentation to show that the meeting minutes which were not posted on their websites during our initial review are currently posted on their websites.

Lastly, Bronx Community Board #5 informed us that the board was unable to post meeting minutes on their website after the office closed in March 2020, and also provided supporting documentation to show that the board asked DoITT to post meeting minutes on September 20, 2021. As of the issuance of this report, the February 2020 general board meeting minutes are now posted on the Bronx Community Board #5's website but the minutes for the May 2020 general board meeting are not.

By not ensuring that all meeting minutes are posted as required, the public's ability to review discussions and deliberations from, and actions taken at, prior Bronx Community Boards' meetings is limited.

## **Two Boards Did Not Maintain Websites with a Translation Feature**

According to Section 23-801 of the NYC Administrative Code, websites maintained "by or on behalf of the city or a city agency shall include a translation feature for viewing the text of that website, wherever practicable, in languages other than English." In addition, the translation feature "shall be indicated by a means, other than or in addition to English, that is comprehensible to speakers of the seven most commonly spoken languages within the city as determined by the department of city planning."

However, our review of Bronx Community Board websites during July 2020, found that 2 of the 12 Bronx Community Board websites did not include a translation feature (Bronx Community Boards #2, and #6). As of the time of this report, Bronx Community Boards #2 and #6 still do not have a translation feature on their website. Bronx Community Boards #2 and #6 both utilize website platforms provided by outside vendors which do not include a translation feature.

After we presented our findings to the Bronx Community Boards, the Bronx Community Board #2 District Manager stated that the board wanted to have its own independent website, but the District Manager is going to recommend that the board to transition to the DoITT website. However, the District Manager noted that staff cannot take action without approval from the board.

Consequently, people of the district who do not speak English may not be informed of issues affecting their community district and may not be able to participate in local government.

## **Did Not Maintain Websites Fully Accessible to Persons with Disabilities**

The NYC Administrative Code, Section 23-802 (a), states that "[t]he mayor or the mayor's designee shall adopt a protocol for websites maintained by or on behalf of the city or a city agency relating to website accessibility for persons with disabilities." According to the New York City Mayor's Office for People with Disabilities, in order to ensure that all City websites were accessible to persons with disabilities, "[t]he Web Content Accessibility Guidelines (WCAG) 2.0 Level AA standard was adopted."<sup>5</sup>

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<sup>5</sup> The WCAG was developed to provide "a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally" and to "explain how to make web content more

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However, based on our review of Bronx Community Board websites during October 2021, 10 of the 12 Bronx Community Boards did not maintain websites that were fully accessible for persons with disabilities. The 10 Bronx Community Board websites had a combined 150 errors—120 website accessibility errors and 30 contrast errors—as detailed in Table VII below.

**Table VII**

Bronx Community Boards' Website  
Accessibility and Contrast Errors

<b>Bronx Community Board</b>	<b># of Website Accessibility Errors</b>	<b># of Contrast Errors</b>	<b># of Total Errors</b>
CB1	10	2	12
CB2	8	0	8
CB3	0	0	0
CB4	18	0	18
CB5	22	6	28
CB6	19	10	29
CB7	18	1	19
CB8	7	11	18
CB9	6	0	6
CB10	6	0	6
CB11	0	0	0
CB12	6	0	6
<b>Total</b>	<b>120</b>	<b>30</b>	<b>150</b>

The 150 website accessibility and contrast errors included, among other things, the following:

- Images missing alternative text. Without alternative text, the content of an image will not be available to screen reader users, which read aloud web pages for people who cannot read the text, or when the image is unavailable.
- Empty headers and links. An empty heading will present no information and may introduce confusion. If a link contains no text, the function or purpose of the link will not be presented to the user. This can introduce confusion for screen reader users and users only using the keyboard to navigate through the web content.
- Missing form labels which provide visible descriptions and larger clickable targets.
- Very low contrast between text and background colors, which can make it difficult for screen readers with low vision or color vision deficiency to read text.

Eight of the 10 Bronx Community Boards utilize websites provided by DoITT which accounted for 113 of the 150 total accessibility and contrast errors (75.3 percent). Bronx Community Boards #2

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accessible to people with disabilities.” As of July of 2021, the City of New York has adopted the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA standard.

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and #6 utilize website platforms provided by outside vendors and accounted for 37 of the 150 total accessibility and contrast errors (24.7 percent).

After we presented our findings to the Bronx Community Boards, some Bronx Community Board officials stated that they were unaware of any errors pertaining to website accessibility and that the Community Boards are not responsible for website accessibility, since they only send documents to DoITT to post on their website. Further, some Bronx Community Board officials stated that DoITT has not dedicated adequate resources to assist the Community Boards with their website and technical needs. Some Community Board officials informed us that only one DoITT employee is assigned to assist all 59 Community Boards. Additionally, some Bronx Community Board officials noted a lack of guidance and instruction from other City agencies that are responsible for assisting the Community Boards.

Consequently, by not fully adopting the protocols required to make their websites accessible for persons with disabilities, the Bronx Community Boards increased the risk that people within their districts with disabilities may not be informed of issues affecting their community district and able to fully participate in local government.

## Recommendations

The Bronx Community Boards should:

6. Provide adequate public notice of upcoming meetings on their websites and include information such as the date, time, and location of the meeting as well as the internet address of the website streaming such meeting if applicable;
7. Post meeting minutes from meetings for the past 12 months on their websites; and
8. Contact DoITT and website platform vendors to ensure that their website includes a translation feature that allows the text of their website to be viewed in the seven most commonly spoken languages in the City and are fully accessible to persons with disabilities as per the WCAG 2.0 Level AA standard.

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## DETAILED SCOPE AND METHODOLOGY

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope of this audit covered the period of July 1, 2019 through September 30, 2021.

To gain an understanding of the rules, regulations, policies and procedures with which the Bronx Community Boards must comply when conducting public meetings and hearings, and maintaining a website, we reviewed the following: the New York City Charter Chapter 70, Sections 2800(d)(22) and 2800(h); the New York City Administrative Code, Sections 23-801 and 23-802(a); the New York City Community Boards Handbook 2015; the New York State Department of State, Committee on Open Government, Open Meetings Law; the New York State Department of State, Committee on Open Government, Open Meetings Law Advisory Opinions #3834 and #4895; the New York State Department of State publication titled “*Conducting Public Meetings and Public Hearings*”; and the Bronx Community Board bylaws.

To gain an understanding of the 12 Bronx Community Boards’ procedures relating to public meetings and hearings, and maintaining a website, we issued and received responses to a questionnaire from each board. The questionnaire included questions regarding conducting public meetings and hearings, public notice, public participation, broadcasting and cablecasting of public meetings, and training, guidance, and support from external parties.

To determine whether the 12 Bronx Community Boards conducted required monthly meetings and public hearings, we requested and obtained general board meeting minutes and public hearing minutes from July 2019 through November 2020. We did not include the months of July 2019, August 2019, July 2020, and August 2020 as part of our analysis since boards are not required to meet during the months of July and August. Further, we did not include the months of March 2020 and April 2020 due to the COVID-19 pandemic. Therefore, we reviewed a total of 11 months. We reviewed meeting agendas and minutes to determine whether a meeting and hearing were held each month as required.

To determine whether the 12 Bronx Community Boards provided adequate public notice of its September 2021 general board meetings and hearings, we reviewed each board website and other materials to determine where and how the boards were providing public notice of meetings. We also requested and obtained detailed information regarding where, when, and how each board provides public notice of meetings and hearings through the questionnaire.

To determine whether the 12 Bronx Community Boards set aside time to hear from the public at public meetings, we conducted unannounced observations of the September 2020 monthly general board meeting for each board that published public notice of the meeting on their website. We observed the September 2020 general board meeting through the remote virtual platform provided by the board and determined whether the board set aside time to hear from the public during the meeting.

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To determine whether the 12 Bronx Community Boards made general board meetings and hearings available for broadcasting and cablecasting during Fiscal Year 2020, we requested each board to provide information about whether and how meetings and hearings are broadcasted and cablecasted.

To determine whether the 12 Bronx Community Boards maintained websites, we reviewed the Bronx Borough President's Office website, the Green Book Online, and conducted internet searches on Google to identify each board website address. For each board that maintained a website, we determined whether the website provided verifiable board contact information.

To determine whether the 12 Bronx Community Boards maintained websites which included a translation feature that is comprehensible to speakers of the seven most commonly spoken languages within the City, we reviewed each board website as of July 2020. We determined whether each board website: (1) contained a translation feature and the number of languages which were available to translate; and (2) had the ability to translate to the seven most commonly spoken languages within the City.

We reviewed each board website to determine whether the 12 Bronx Community Boards maintained websites which contained meeting minutes from past meetings for the past 12 months. In June 2020, we reviewed each of the 12 Bronx Community Board websites to determine whether and to what extent the boards published meeting minutes from past meetings for the past 12 months. We did not include the months of July 2019 and August 2019, as part of our analysis since boards are not required to meet during the months of July and August. Further, we did not include the months of March 2020 and April 2020 due to the COVID-19 pandemic. Therefore, we reviewed meeting minutes for a total of eight months (June 2019, September 2019 through February 2020, and May 2020).

To determine whether the 12 Bronx Community Boards maintained websites which were fully accessible for persons with disabilities, we utilized the Web Accessibility Evaluation Tool as recommended by the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA. In January and February 2021, we used the Web Accessibility Evaluation Tool to evaluate each board website and determine whether and to what extent the board websites contained accessibility errors and/or contrast errors.

The above tests, while not projectable to their respective populations wherever a sample was used, provided a reasonable basis for us to evaluate the 12 Bronx Community Boards' controls over public meetings and hearings, and maintaining a website.

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## APPENDIX

### Summary of Findings Related to Public Meetings and Hearings and Website Content

Community Board	Complied with Requirements (Yes/No)											
	Meetings and Hearings						Website Content					
	Held Meetings Each Month	Held Hearings Each Month	Made Meetings and Hearings Available for Broadcasting on the Radio or Internet	Made Meetings and Hearings Available for Cablecasting	Provided Adequate Public Notice via Media and Physical Posting	Set Aside Time to Hear from Public	Maintained a Website	Adequate Public Notice of Meetings and Hearings	Meeting Minutes for the Past 12 Months	Board Contact Information	Translation Feature	Fully Accessible to Persons with Disabilities
CB1	No	No	No	No	No	Yes	Yes	Yes	No	Yes	Yes	No
CB2	No	No	Yes	No	No	Yes	Yes	No	No	Yes	No	No
CB3	Yes	No	No	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes
CB4	No	No	No	No	No	Yes	Yes	Yes	No	Yes	Yes	No
CB5	Yes	No	No	No	No	Yes	Yes	Yes	No	Yes	Yes	No
CB6	Yes	No	Yes	No	No	Yes	Yes	Yes	Yes	Yes	No	No
CB7	No	No	No	No	Yes	Yes	Yes	Yes	No	Yes	Yes	No
CB8	Yes	No	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
CB9	No	No	No	No	Yes	Yes	Yes	Yes	No	Yes	Yes	No
CB10	No	No	No	No	No	Yes	Yes	No	No	Yes	Yes	No
CB11	No	No	Yes	No	No	Yes	Yes	Yes	No	Yes	Yes	Yes
CB12	No	No	No	Yes	No	Yes	Yes	No	No	Yes	Yes	No