

Legislation Text

File #: 21-0005, **Version:** 1

Summary

To: Town Commission
From: Cathy DeKarz, Management Analyst
Date: 1/19/2021

Subject:

Discussion of Draft Digital ADA Compliance Policy

Summary:

Over the past three years, staff has been working to understand, analyze, and remediate the Town of Belleair's website and associated content to ADA compliance standards. As the Town's Consent Decree from the Tampa Division District Court expires on August 29, 2021, staff is seeking feedback from the Commission on several large decisions that will affect the presented Digital ADA Compliance Policy.

Previous Commission Action: As a part of the strategic planning process, the Commission identified "Ensure digital communications are accessible per ADA WCAG 2.1 AA standards" as an objective to be completed between 2020 and 2023.

Background/Problem Discussion: See attached and below.

Expenditure Challenges Though some compliance tasks will not incur any significant additional costs to the Town, several items do present expenditure challenges.

- **Third-party accessibility checker:** A digital tool integrated with a website that automatically flags compliance gaps and instructs users on compliance solutions.

The Town of Belleair partnered with Monsido in September of 2020 to assist with the digital ADA compliance of our website. Since onboarding Monsido, site-wide compliance has risen from roughly 67% compliance to almost 84%.

Annual cost: \$3,410

No Commission action required

- **External PDF remediation:** Most PDFs uploaded directly to the Town's website can be remediated for ADA compliance in-house. However, some larger documents may require external remediation.

If external remediation is required, the Town will benefit from a reduced pricing structure for document remediation through CommonLook (these savings are available to all Monsido customers).

Remediation cost per page: \$5 - \$15

Known pages for remediation: ~ 460 pages x \$5/page quote = \$2,300

No Commission action required

- **Closed captioning:** Video and audio streams produced by government agencies must include closed captions to be ADA compliant. According to WCAG requirements, automatic captions (such as those produced for free or at low costs by Zoom, YouTube, Facebook, and services such as Otter AI) are not sufficient due to their inaccuracy.

Some services provide compliant captions completed 100% by humans, but these are expensive. However, staff has had contact with Verbit, an international company that provides a hybrid approach (AI plus human editing) at about half of the cost. This solution would connect virtual captioners to all streamed content on Zoom, Facebook, etc. via an API token (a secure method for data privacy concerns). The closed captions provided through Verbit are embedded into videos for both live and future consumption and are keyword searchable.

All closed captioning services researched charge by the minute.

Estimated annual Commission minutes: ~ 90 min/meeting x 25 meetings = 2,250 minutes

Estimated annual board minutes: ~ 60 min/meeting x 60 meetings = 3,600 minutes

Estimated total annual minutes: ~ 5,850 minutes

Fully-human transcription cost: \$2.75/minute = ~ \$16,087.50 per year

Hybrid transcription cost (via Verbit): \$1.33/minute = ~ \$7,780.50 per year

Note: One option to see future savings for closed captioning could include only streaming Commission meetings and high-profile board meetings. This option may make more sense in a post-COVID world where in-person meetings are again a viable option.

Commission input requested

- **Agenda documents:** Digital ADA compliance of agendas and agenda documents has been a top concern in the State of Florida due to the 175+ lawsuits filed in the state over the past several years. However, solutions for agenda document compliance tend to result in a win-lose scenario.

Most of Belleair's Commission agenda packets are around 100 pages, and most board packets around 50. Using the same meeting estimations from above, this results in about 5,500 pages of agenda packet content per year. Even with the discounted CommonLook pricing, agenda packet remediation as-is would cost the Town roughly \$15,500 per year. What's more, due to the size and complexity of our agendas, it could take several weeks to remediate each, in addition to staff time to manage contracts and uploads.

Seeing how remediating to current practices is cost and time prohibitive, another option for compliance is to reduce the amount of content included with each agenda packet. With this option, staff could post simple 1-2 page agendas that only list the items to be discussed, which would allow staff to remediate content in-house quickly and affordably. Additional agenda documents could then be provided to the Commission (and the public upon request) via email as a workaround to the compliance challenge. However, this option does limit the ease with which the public can access meeting documents.

After conducting research and/or speaking with representatives from Pinellas County, the City of Largo, and the City of Dunedin, our neighbors are grappling with this difficult decision as well. To-date, all three of these entities are continuing to post non-compliant agenda packets through third-party host sites such as Granicus. However, due to our Consent Decree, Belleair must take a definitive action toward agenda compliance.

Commission input requested

Financial Implications: N/A

Recommendation: Staff recommends approval of the Digital ADA Compliance Policy alongside guidance from the Commission on closed captioning and agenda document options.

Proposed Motion I move approval of the Digital ADA Compliance Policy with conditions...