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Office of the City Manager

To: Honorable Mayor and Members of the City Council

From: Paul Buddenhagen, City Manager

Submitted by: Terrance Davis, Director, Public Works

Subject: Companion Report: City Compliance with Web Content Accessibility Guidelines (WCAG)

<u>RECOMMENDATION</u>
The City Manager recommends that Council refrain from referring the Commission on Disability's report recommendation from the report titled, "City Compliance with Web Content Accessibility Guidelines (WCAG)," to the City Attorney's Office at this time to give staff and the Commission on Disability additional time to develop a mutually agreeable path forward.

<u>FISCAL IMPACTS OF RECOMMENDATION</u>
Funding for staff time for the administration of the first recommendation has not yet been calculated within each City department. The addition contracts clause requiring vendors supply WCAG-compliant digital content would involve the following costs, which are not included in the current City budget:

- City Attorney's Office staff time and/or a contractor to develop the contract language,
- Finance Department staff time to update contract boilerplates,
- Additional staff training on steps to correct simple accessibility errors,
- Potential increase in contractor costs to adhere to accessibility requirements,
- Staff time from every City department, as well as Library, Rent Board, and Housing Authority to monitor contracts and ensure compliance

Costs to implement the second recommendation, to put in place systems ensuring documents meet WCAG standards, have not been estimated but are likely to be significant given then number of documents currently on the city website

While the City's website was designed to be WCAG compliant, the City recognizes that the constant publication of non-compliant documents creates substantial barriers for community members and the City's own ability to maintain a WCAG compliant site. Publications should be WCAG compliant upon web publication. The recommendation to remediate all current website documents within 30 days of being informed they do not

meet WCAG standards is expensive and staff is committed to working on a taskforce with commission members to discuss timelines and a plan

CURRENT SITUATION AND ITS EFFECTS
Accessibility is a core principle that informed the design and build of berkeleyca.gov, which launched May 2022. The City's website software, design and architecture were built to WCAG standards and continue to be updated to improve accessibility.

Nearly 100 staff across the City of Berkeley, Rent Board, and Housing Authority have access to add content to the City website. Accessibility is woven in to all the web training these staff receive. The Communications team in the City Manager's Office has led three trainings in the past year specifically addressing WCAG document accessibility and created a two page guide on best practices.

The City's ADA Program Coordinator currently provides support for WCAG compliance on a case-by-case basis and will continue to do so.

Despite the City's ongoing work to support full WCAG compliance, many PDF documents are added to the website on a daily basis, and PDFs are a challenging format to make accessible. Many are created by 3rd-party legacy systems managed by different City Departments. With over 16,000 documents on berkeleyca.gov and dozens added each day, document accessibility is a large, citywide issue. In addition to the aforementioned training, staff prioritize remediating upon public request and converting to HTML the most commonly accessed documents, such as recreation schedules and City fees and rates.

The City Manager supports the adoption of a contractual requirement for all vendors to be WCAG compliant and is committed to supporting staff's work with a joint staff/ Commission on Disability Commissioner taskforce to address all of the commission's concerns as collaboratively as possible.

BACKGROUND
The Commission on Disability took the following action at its April 9, 2025 meeting:

Action: Motion (Fischer/Lewkowicz) To approve the recommendation to City Council regarding WCAG.
Votes**:** Ayes: Walsh, Fischer, Pugh, Sun, Lewkowicz, Mann, and Holloway; Nays: None; Abstain: None; Unexcused Absence: None; Leave of Absence: Paz

On July 9, 2025, the Commission on Disability received a staff presentation regarding the status of existing compliance efforts and resource challenges related to implementation. Based on staff's feedback, the Commission voted to create a subcommittee that would work directly with staff to establish a WCAG Task Force that

would be tasked to collaboratively develop a roadmap to identify WCAG priorities and implementation phasing timelines.

ENVIRONMENTAL SUSTAINABILITY AND CLIMATE IMPACTS
None have been identified at this time.

RATIONALE FOR RECOMMENDATION
It is necessary to understand the full budgetary implication of remediation and ongoing compliance with WCAG, prior to adoption of the Commission's Recommendation.

ALTERNATIVE ACTIONS CONSIDERED
Beginning to immediately require WCAG compliance requires staff to begin planning to remove or update an unknown number of existing documents within the recommended 30-day period. An assessment of existing documents out of WCAG compliance has not been conducted in every City department. The City currently does not have the required budget or staff technical expertise for complete compliance. An outside vendor to conduct this assessment is not part of an existing budget.

CONTACT PERSON
Thomas Gregory, ADA Program Coordinator, Public Works, 510-981-6418
Wahid Amiri, Deputy Director, Public Works, 510-981-6396
Matthai Chakko, Communications Director/Assistant to the City Manager, City Manager's Office, (510) 981-7008