

Website Accessibility Compliance and Remediation Plan

I'm presenting a matter of immediate concern regarding our district's legal compliance and commitment to serving all constituents: the accessibility of documents on our website. This is a discussion with a possible action to authorize WCSD to enter into a service agreement with Streamline for its **DocAccess** solution at the estimated **\$150 per month** to ensure compliance with the:

- Web Content Accessibility Guidelines (WCAG) 2.1
- California Assembly Bill 434 (AB 434)
- Unruh Civil Rights Act

Overview:

- Our website currently has over 1,800 PDF pages (*with an additional 200+ Word documents that will need to be converted to PDFs*) that are *not screen-reader accessible*. This non-compliance creates a significant legal and financial risk for the district.
- We are out of compliance with key state and federal laws that require public entities, including special districts, to ensure their digital services are accessible to people with disabilities.

The proposed solution is **Streamline's DocAccess**:

To address this gap efficiently and *cost-effectively*, I recommend adopting Streamline's DocAccess solution.

- **Service Functionality:** DocAccess is an automated solution that provides an on-demand WCAG 2.1 AA HTML transcript for every PDF on our site, effectively making the documents screen-reader accessible without requiring any manual tagging or changes to our current file-upload workflow.
- **Cost-Effectiveness:** Manual remediation for our estimated 3,000 pages (current PDFs and Word documents) would cost weeks of staff time.
 - The proposed DocAccess service, covering an estimated 3,000 pages, is offered at the \$150/month tier.
- **Key Features:** The service includes valuable features that enhance accessibility:
 - **Aira 24/7 live visual interpreter** for complex visuals like maps or charts.
 - **Digital Table of Contents** for long documents.
 - **AI Q&A** that can answer questions based only on the document's content.
 - **150+ language translation.**

The Legal Mandate for Website Accessibility

The requirement for website accessibility is derived from multiple legal sources:

- **Americans with Disabilities Act (ADA)**: Public entities must ensure services are accessible. This extends to digital services, meaning websites must be perceivable, operable, understandable, and robust for all users.

- **Web Content Accessibility Guidelines (WCAG) 2.1 AA**: This is the internationally recognized standard for web accessibility. AB 434 requires state agencies to certify compliance with the WCAG 2.0 Level AA standard, underscoring California's commitment to this level of digital accessibility, which serves as a model for special districts.

- **California's Unruh Civil Rights Act**: Courts have interpreted this act, which guarantees full and equal accommodations in all business establishments, to apply to digital services, including websites.
 - Failing to make our website accessible is a potential violation of both the ADA and the Unruh Act.
 - Non-compliance with the Unruh Act exposes the district to statutory damages of \$4,000 per violation, plus attorneys' fees, which can quickly accumulate into significant costs.

Recommendation

I recommend the Board authorize WCSD to enter into an agreement with Streamline for the DocAccess service at the estimated \$150/month tier. This proactive step will mitigate our legal risk, protect us from potential financial penalties of \$4,000 per violation, and fulfill our commitment to providing all constituents with equitable access to district information and services.