

*Mendocino County Russian River Flood Control
& Water Conservation Improvement District*

STAFF REPORT

**Agenda Item 8: Website Document Accessibility Service
Monday, December 8, 2025**

The Strategic Plan relevant priority is **Administration** through fostering sustainable management of agency resources.

- Enhanced document accessibility services will ensure continued ADA compliance with new ADA legal standards that take effect in 2026.

Background:

In April 2024, the US Department of Justice (DOJ) published new rules for Title II of the Americans with Disabilities Act (ADA) to ensure the accessibility of web content and mobile applications for people with disabilities. The final rules mandate technical standards for state and local governments to help ensure the accessibility of their programs and services provided through the web and mobile applications. The DOJ has published the [ADA Fact Sheet: New Rule on the Accessibility of Web Content and Mobile Apps Provided by State and Local Governments](#) to assist with complying with the new website requirements. See Attachment 1 for summary of legislative requirements for special districts.

The District contracts with Streamline to host and maintain its website. Streamline provides specialized website hosting for local government agencies that ensure compliance with federal, state, and ADA laws. In July 2024, Streamline adjusted its hosting service rates to address implementation of the DOJ website requirements that went into effect July 1, 2024.

Additional ADA and state accessibility requirements take effect in early 2026, with DOJ enforcement scheduled for 2027. The new standards require specialized document accessibility and translation that will be difficult to achieve with staffing resources and will require upgraded software.

To address these requirements, Streamline has developed DocAccess, a service that ensures document accessibility, automated translation capability, and a screen reader to meet visually impaired accessibility standards.

Further, Streamline provides indemnification, providing assurance against accessibility lawsuits. Streamline is offering \$50,000 in indemnity coverage compared to \$10,000 coverage in the regular plan. This promotion will only last until December 24, 2025.

Following are highlights of the DocAccess proposal (Attachment 2) for the Pro Plan:

- Automated document access, translation, Q&A function, compliance monitoring & reporting
- Includes \$50,000 indemnification; unlimited document coverage
- Meets CA accessibility requirements now, with DOJ enforcement in 2027
- Covers 20,000 pages currently posted plus future posted documents.

(Continued...)

Budget Consideration

A three-year contract of \$20,160 is \$560 a month/\$6,720 a year (paid annually) which would include a 30% cost savings.

Website expenses are included in the District's budget account 5160 Office Operating Expenses, which for FY 2025/26 is \$7,000 with approximately \$1,500 earmarked for the annual Streamline fee. The cost of the DocAccess service would need to be covered by reducing another budgeted allocation or using operational reserves.

Potential reallocation options:

- ACWA annual membership dues: \$4,730
- Grants/Funding analysis: \$5,000
- LAFCo Apportionment fee: \$500 less than budgeted.

Historical Streamline Hosting Service fees:

2022 & 2023: \$900

2024: \$1,008

2025: \$1,500 (due to increased ADA compliance requirements)

Discussion

Staff is seeking direction regarding Streamline's add-on DocAccess service that will ensure continued ADA compliance with new ADA legal standards that take effect in 2026. In approving the proposal, the Board would also direct staff regarding a possible budget amendment to shift unutilized funds from other accounts to cover the \$1,100 increase to account 5700.

Recommended Actions:

- Move to approve the DocAccess Accessible Document Service Proposal for the three year term; and
- Provide direction to Staff regarding budget allocations.

Attachments

- CA Legislative Requirements for Special District Websites and ADA Compliance
- Streamline's Accessibility Document Service Proposal

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Prepared and submitted to the Board of Trustees by: *Elizabeth Salomone, General Manager*

Legislative Requirements for Special District Websites and ADA Compliance

In California, special districts are required to maintain websites that comply with accessibility standards to ensure all citizens, including those with disabilities, have equal access to information and services.

Senate Bill 929 (SB 929)

Enacted in 2018, SB 929 requires all independent special districts in California to establish and maintain a website by January 1, 2020. The bill stipulates that these websites must include:

- Contact information for the district
- Agendas and minutes of board meetings
- A current budget
- Any other information deemed pertinent by the district

While SB 929 mandates the creation of websites, it does not explicitly address accessibility requirements. However, compliance with state and federal accessibility laws is implied.

Assembly Bill 434 (AB 434)

Effective July 1, 2019, AB 434 requires state agency websites to certify compliance with the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA standards. Although AB 434 specifically targets state agencies, it underscores California's commitment to digital accessibility, serving as a model for other public entities, including special districts.

Americans with Disabilities Act (ADA) Compliance

Under the ADA, public entities, including special districts, must ensure their services are accessible to individuals with disabilities. This extends to digital services, meaning websites must be perceivable, operable, understandable, and robust for all users. Non-compliance can result in legal action, financial penalties, and reputational harm.

The Unruh Civil Rights Act

The Unruh Act (California Civil Code § 51) guarantees that all individuals—regardless of disability, race, sex, religion, or other protected status—are entitled to full and equal accommodations and services in all business establishments, including those operated by public agencies.

While originally intended for physical spaces, courts have interpreted the Unruh Act to apply to digital services, including websites. In practice, this means a special district's failure to make its website accessible may not only violate the ADA but also the Unruh Act, exposing districts to **statutory damages of \$4,000 per violation**, plus attorneys' fees.

Consequences of Non-Compliance

Legal Action

Thousands of web accessibility lawsuits are filed annually. Courts are increasingly recognizing that inaccessible websites are a form of discrimination.

Financial Penalties

In California, statutory damages of \$4,000 per occurrence under the Unruh Act can accumulate quickly, leading to significant costs.

Reputational Damage

Non-compliance erodes public trust and can harm relationships with constituents.

Government Agency ADA Compliance Lawsuits

- **National Association of the Deaf (NAD) v. Harvard & MIT (2015)**: Failure to caption online content led to a major settlement and revised accessibility practices.
 - **California Department of Corrections and Rehabilitation (2020)**: Required digital upgrades following lawsuit over inaccessible services.
 - **Florida Department of State (2019)**: Election websites updated after lawsuit over inaccessibility.
 - **Chicago Public Schools (2017)**: Forced to revamp digital content after a federal investigation.
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Solutions for Achieving Website Accessibility Compliance

1. **Conduct Accessibility Audits:** Use tools like WAVE or Axe to identify and fix issues.
2. **Implement WCAG Guidelines:** Aim for WCAG 2.1 Level AA standards.
3. **Provide Training:** Equip staff with knowledge on accessibility best practices.
4. **Engage Accessibility Experts:** Partner with professionals to guide and validate remediation.
5. **Maintain Ongoing Monitoring:** Regularly test and ensure new content is compliant.

By proactively addressing website accessibility, special districts can provide equitable access to all constituents, mitigate legal risks, and demonstrate a commitment to inclusivity.



Accessible Document Service Proposal

Transform Your PDFs into Fully Accessible, Searchable, and Translatable Documents

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Executive Summary

Russian River Flood Control District faces a critical deadline for PDF accessibility compliance. After analyzing **1,251** links across its web properties, the DocAccess tool discovered **1,117** documents containing approximately **20,000** pages. With this agreement, DocAccess will ensure **all current and future documents on rrfc.specialdistrict.org** are served in an accessible format. Traditional remediation of all these documents would cost approximately **\$140,000** or could take **84 weeks** of dedicated staff time.

DocAccess offers an immediate, cost-effective solution at just \$640 per month – that's **95%** less than traditional remediation in the first year alone, with instant deployment and ongoing compliance.

The Accessibility Challenge

Under the Americans with Disabilities Act (ADA) and recent Department of Justice guidelines, all public-facing digital content must be accessible to people with disabilities. This includes:

- ✓ Meeting WCAG 2.1 AA standards for all PDF documents

- ✓ Providing equal access to information for all users

- ✓ Avoiding costly lawsuits and compliance penalties

- ✓ Serving your community's **15-20%** of residents with disabilities

- ✓ **Enhancing accessibility for Russian River communities by providing translated materials ensures that non-English-speaking residents—who make up a significant portion of the local population—can fully understand and participate in flood control initiatives (U.S. Census Bureau, 2022).**

The DocAccess Solution

DocAccess transforms your existing PDFs into fully accessible documents without changing your files or website structure. Our cloud-based solution provides:



Instant Accessibility

Automatic conversion to screen-reader compatible HTML with proper semantic structure and WCAG 2.1 AA compliance.



150+ Language Translation

Real-time translation powered by Google Translate, prioritizing languages spoken in your service area.



AI-Powered Search & Q&A

Users can search within documents and ask questions in plain language, getting instant answers in their preferred language.



Live Visual Interpretation

24/7 access to professional interpreters via Aira for users who need additional assistance - included at no extra cost.



Mobile Optimization

Responsive design ensures perfect viewing on all devices, from smartphones to desktop computers.



Smart Image Description

AI-generated comprehensive alt-text for all images, charts, maps, and diagrams following WCAG best practices.

Technical Excellence & Compliance



DocAccess is built on industry-leading standards and partnerships:

- ✓ Full WCAG 2.1 AA compliance verified by VeraPDF validation
- ✓ Section 508 and ADA Title II & III compliance
- ✓ ISO 14289 (PDF/UA) standard adherence
- ✓ Tested with all major screen readers (JAWS, NVDA, VoiceOver)
- ✓ Regular audits by accessibility experts
- ✓ Continuous improvement through user feedback

Simple Implementation Process

Quick Installation (15 minutes)

1

Add one line of code to your website - similar to Google Analytics. Works with any CMS or platform.

Automatic Processing (24 hours)

2

DocAccess scans and processes all your PDFs, creating accessible versions without touching your original files.

Go Live & Stay Compliant

3

Your PDFs are now fully accessible. New documents are processed automatically. Full dashboard for monitoring.

Investment & Value

Recommended Plan: Pro

\$640/month

For all current and future documents on rrfc.specialdistrict.org

Includes \$10,000 in indemnification coverage

What's Included:

- ✓ Unlimited document views and downloads
- ✓ Automatic processing of new documents
- ✓ All accessibility features (translation, Q&A, live assistance)
- ✓ Compliance monitoring dashboard
- ✓ Regular accuracy reviews by experts
- ✓ No setup fees or hidden costs
- ✓ Flexibility to change plans anytime

Cost Comparison:

Traditional PDF remediation: **\$140,000** (one-time)

DocAccess solution: **\$640** per month

You save \$132,320 in the first year alone!

Frequently Asked Questions

Do I need to remediate my existing PDFs?

No. DocAccess creates fully compliant WCAG 2.1 AA compliant HTML formats that are the gold standard for ADA requirements. Your original PDFs remain unchanged as an alternative format for printing.

How quickly can we be compliant?

Most organizations are fully operational within 24-48 hours of installing the DocAccess code. Complex documents may take slightly longer for our quality review process.

What about documents on external sites we link to?

DocAccess uniquely handles external PDFs you link to, ensuring your users have an accessible experience even with third-party documents.

Is this solution legally compliant?

Yes. DocAccess meets all federal ADA requirements and state-specific regulations. We offer up to \$250,000 in indemnification coverage for added protection.

Service Agreement

This Software as a Service Agreement ("Agreement") is entered into on **December 17, 2025**, between Streamline Software Incorporated ("Provider") and **Russian River Flood Control District** ("Customer").

Services Provided

DocAccess is a subscription-based accessibility solution that includes:

- Automated document accessibility compliance
- Real-time translation to 150+ languages
- AI-powered search and Q&A functionality
- 24/7 live visual interpretation services
- Compliance monitoring and reporting

Terms

- **Subscription: Pro Plan** - all current and future documents on rrfc.specialdistrict.org pages
- **Fee: \$15,360 for 2 years (\$640 per month)**
- **Billing Cycle: Every 2 years, beginning December 2025**
- **Payment Terms: Net 45**
- **Contract Term: 2-year prepaid term (20% discount)** - enjoy our price lock guarantee for the duration of the contract term.
- **Price Protection:** Your price stays fixed during your subscription term, even if you increase usage up to 200% of your original page count. This flexibility supports public organizations' ability to communicate freely and maintain transparency.
- **Indemnification Coverage: \$10,000** - protecting you against accessibility-related claims

This Agreement incorporates the DocAccess Terms of Service available at docaccess.com/terms-of-service

Special Terms

The following special terms supersede the standard DocAccess Terms of Service:

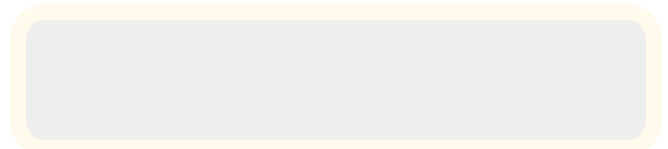
\$50,000 in indemnification coverage

Streamline Software, Inc.



Name: Mac Clemmens

Russian River Flood Control District



Name: Elizabeth Salomone

Title: CEO
Date: December 17, 2025

Title: General Manager
Date: December 17, 2025

W-9 available at getstreamline.com/w9 | Fed Tax ID: 26-3341975