

TO: KAREN HOSKINS, CITY MANAGER

CC: WILLIE HORTON, USD EXECUTIVE DIRECTOR
ANDREW DEGRAFFENREIDT, CITY ATTORNEY

FROM: CLAUDENE L. ANTHONY, CMC, CITY CLERK *CA*

DATE: JUNE 12, 2018

RE: ADA COMPLIANCE

Attached you will find a copy of the complaint filed against the City of West Palm Beach concerning non-compliance with the Americans with Disability Act relative to the broadcast of meetings and web content; this type action is being taken against various entities.

I am bringing this to your attention as a decision has to be made reference the live streaming and broadcasting of our various meetings and other programming.

In addition, I have attached information obtained from the US Department of Justice website, WAVE, and SEAMLESS GOV reference this matter for your review.

I am of the opinion, this is a matter in need of attention sooner rather than later in an effort to assuage action being taken against the city for same.

Thanking you in advance for your immediate attention in this matter.

Attachment

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH CIVIL DIVISION

CIVIL ACTION NO.:

EDDIE I. SIERRA,

Plaintiff,

vs.

CITY OF WEST PALM BEACH, FLORIDA

Defendant.

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

The Plaintiff, EDDIE SIERRA, by and through his undersigned counsel, hereby files his Complaint against the CITY OF WEST PALM BEACH, Florida for declaratory and injunctive relief, and in support states as follows.

INTRODUCTION

1. This is an action under Title II of the Americans with Disabilities Act of 1990 and under Section 505 of the Rehabilitation Act of 1973 through which Section 504 of the Rehabilitation Act of 1973 ("Rehabilitation Act") is enforced, to redress unlawful disability-based practices and to make plaintiff Eddie Sierra whole. Defendant CITY OF WEST PALM BEACH, Florida ("CITY OF WEST PALM BEACH") is a public entity which denied Eddie I. Sierra both access to Defendant's archived video for streaming on demand and access to live streaming¹ of Defendant's City Commission meetings, on the basis of his disability, being hard of hearing and deaf. In so doing, the CITY OF WEST PALM BEACH denied Eddie I. Sierra a fundamental right

¹ As used herein live streaming means the streaming of a live event, over the internet, as it occurs.

6. Plaintiff requested that the CITY OF WEST PALM BEACH provide auxiliary aids and services—closed captions—for its online content in a timely and accurate fashion. CITY OF WEST PALM BEACH has not provided closed captions or any other auxiliary aids or services for its online audiovisual content. In three months since Plaintiff made the request, the CITY OF WEST PALM BEACH has not answered Plaintiff's request.

7. CITY OF WEST PALM BEACH's denial of its publicly available online content to deaf and hard of hearing persons violates Section 504 of the Rehabilitation Act and Title II of the ADA.

8. Accordingly, Plaintiff seeks injunctive and declaratory relief to ensure that deaf and hard of hearing individuals have equal, effective and timely access to CITY OF WEST PALM BEACH's publicly available online content, and other damages as pled *infra*.

JURISDICTION AND VENUE

9. Plaintiff brings this action under sections 12132 and 12133 of the ADA, 42 U.S.C. §§12132 and 12133 incorporating by reference the remedies, procedures and rights under the Rehabilitation Act, 29 U.S.C. §§794 and 794a(a)(2) and (1)(a), and under section 505 of the Rehabilitation Act, which enforces Section 504 of the Rehabilitation Act, 29 U.S.C. Section 794 and 794a(a)(2) incorporating the remedies, rights and procedures set forth in section Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000d et. seq.

10. This Court has federal question jurisdiction pursuant to 28 U.S.C. §1331 and 42 U.S.C. §12188. This Court's jurisdiction is proper under 28 U.S.C. §§ 451, 1331, and 1343.

11. CITY OF WEST PALM BEACH's unlawful practices have been occurring since 2014 and continue to occur in the Southern District of Florida.

the ADA and Rehabilitation Act. The Twenty-First Century Communications and Video Accessibility Act (CVAA) is not applicable to this action because Defendant is exempt from the closed captioning requirements under the CVAA. The Federal Communications Commission regulations grant self-implementing exemptions (Defendant is not required to apply for the exemption) from the CVAA closed captioning requirements if a video programming provider has not made more than Three Million Dollars (\$3,000,000) from a channel of programming in the previous year. Because Defendant has not received revenue in excess of \$3,000,000 from the operation of its government access channel, it is automatically exempt from the CVAA closed captioning requirements. Since Defendant is exempt from the CVAA, it cannot violate the CVAA. As a result, Plaintiff does not have CVAA administrative remedies available at the Federal Communications Commission (FCC) which accepts complaints that allege a violation of the CVAA regulations. *See*, 47 C.F.R. 79.1(g)(1). However, “[W]hen it [FCC] adopted closed captioning mandates for television, the Commission made clear that entities that qualify for an exemption from the FCC’s closed captioning requirements may be obligated under other federal statutes, such as the Americans with Disabilities Act (ADA), to make their services and programs, including video programming services accessible to individuals with disabilities. *Closed Captioning and Video Description of Video Programming, Implementation of Section 305 of the Telecommunications Act of 1996, Video Programming Accessibility*, Report and Order 13 FCC Rcd 3272, 3342, n.534 (1997) (1997 Closed Captioning Order). “[T]he Commission’s rules and are not intended to ‘preclude or supersede the operation of federal laws that may require an entity exempt from the [the FCC’s closed captioning requirements] to make its video programming services accessible to people with disabilities.’ *1997 Closed Captioning Order*, 13 FCC Rcd 3272,

PALM BEACH COMMISSION. In these simulcast meetings, the CITY OF WEST PALM BEACH COMMISSION is receiving information and statements from the public, negotiating and voting on issues concerning procurement, culture, elections, transportation, zoning, taxes, spending, and parks. The decisions made at the City Commission meetings have a direct effect on the citizens in the region. However, CITY OF WEST PALM BEACH's live streaming is done in a discriminatory manner because it is not closed captioned.

20. CITY OF WEST PALM BEACH also has 1,189 archived videos on its website ranging from 2014 to present which are linked to this complaint. These videos show the City Commission discussing and voting on transportation concerns, procurement contracts, tax rates, and cultural activities. There are also hundreds of other videos on the website of the Planning Board, the Zoning Board, the Downtown Action Committee, the Historic Preservation Board, and West Palm TV. <https://vimeo.com/cityofwfpb/channels>. However, none of this programming is available to persons with hearing disabilities.

21. Persons who are not limited in the major life activity of hearing are able to use the CITY OF WEST PALM BEACH's live streaming and on demand video service to watch and listen to the CITY OF WEST PALM BEACH's legislative decision-making activities via the live streaming service. They are also able to meaningfully use and benefit from other archived videos from CITY OF WEST PALM BEACH.

22. Plaintiff Sierra is prevented from observing and participating in the CITY OF WEST PALM BEACH's live streamed meetings or viewing its archived content identified in ¶20 because of his hearing disability.

23. Plaintiff will return to the CITY OF WEST PALM BEACH website in the near

b) Ensure that no individual with a disability is excluded, denied services, segregated, or otherwise treated differently than other individuals unless the public entity can demonstrate that taking those steps to modify policies, practices, or procedures would fundamentally alter the nature of the service, program, or activity; 28 C.F.R. §35.130(b)(7).

c) Ensure that no individual with a disability is excluded, denied services, segregated or otherwise treated differently than other individuals unless the public entity can demonstrate that legitimate safety requirements are necessary for safe operation. Any safety requirements must be based on actual risks and not on mere speculation, stereotypes, or generalizations about individuals with disabilities; 28 C.F.R. §35.130(h).

29. At all times relevant, CITY OF WEST PALM BEACH has been a recipient of federal financial assistance. In its 2017-18 adopted budget, CITY OF WEST PALM BEACH indicates that it has or will receive millions of dollars in federal financial assistance.

30. Since at least 2014, CITY OF WEST PALM BEACH has engaged in unlawful practices in violation of the ADA Section 12132; 28 C.F.R. 35.130(a)-(b)(1), 28 C.F.R. 35.160(a) and (b)(2) and in violation of Section 504 of the Rehabilitation Act, 29 U.S.C. Section 794. These practices include but are not limited to denying Eddie I. Sierra, an individual with a disability who, with or without reasonable modifications to the rules, policies or practices; the removal of communication barriers; or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services to participate in programs or activities provided by CITY OF WEST PALM BEACH including access to the on demand and live streaming video services of the CITY OF WEST PALM BEACH.

32. For its archived video content, identified above in ¶20, CITY OF WEST PALM

37. Defendant's streaming of video content referenced in ¶19, and ¶20 is a service, program or activity within the definition of Title II of the Americans with Disabilities Act.

38. Plaintiff has visited Defendant's website on different occasions. On March 20, 2018 Plaintiff was denied access to Defendant's video content available on Defendant's website described at ¶20.

39. On December 13, 2017, Plaintiff requested that Defendant provide an auxiliary aid and service for use of its archived video and live streaming of its City Commission meetings.

40. Defendant failed to provide an auxiliary aid and service for Plaintiff after receipt of Plaintiff's request for the same and for the archived videos in ¶20.

41. Defendant has denied Plaintiff the opportunity to participate in or benefit from the ~~programs, services and activities afforded to persons who are not hearing-impaired.~~ Defendant is required to provide full and equal enjoyment of its services, programs, and activities in the most integrated setting appropriate to people with disabilities. 42 U.S.C. §12131, *et. seq.*; 28 C.F.R. Part 35.

42. Defendant has denied Plaintiff these opportunities due to Plaintiff's disability, i.e. his hearing impairment, being deaf.

43. Defendant denied Plaintiff the opportunity to participate in a service, program, or activity due to Plaintiff's disability, being deaf.

44. Defendant has failed to take such steps as may be necessary to ensure that no individual with a disability is excluded, denied participation in a service, program or activity, segregated or otherwise treated differently than other individuals because of the absence of

modifications in its policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity; 28 C.F.R. § 35.130(b)(7).

49. As long as Defendant fails to comply with the ADA, its regulations and WCAG 2.0 AA standards, Plaintiff remains unable to equally and fully access the Defendant's video archives as well as live streaming content identified in ¶19, and ¶20.

50. As a direct and proximate result of Defendant's unlawful discrimination, Plaintiff has sustained injuries and damages.

COUNT II

VIOLATION OF THE REHABILITATION ACT OF 1973

51. Plaintiff adopts the allegations in paragraphs 1 through 35 as if fully set forth herein.

52. Plaintiff is expressly authorized to bring this action under the Rehabilitation Act of 1973, 29 U.S.C. Section 794 and 794a(a)(2) and (b)(1)(A), and under Section 505 of the Rehabilitation Act which enforces Section 504 of the Rehabilitation Act, 29 U.S.C. Section 794 and 794a incorporating the remedies, rights and procedures set forth in Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et. seq.

53. Defendant's video content identified in ¶ 19 and ¶20, includes CITY OF WEST PALM BEACH's live City Commission meetings, and archived City Commission and other videos. None of the archived video content is closed captioned and the live streaming City Commission meetings are not closed captioned.

54. Congress enacted the Rehabilitation Act of 1973 to enforce the policy of the United

Defendants "program or activity" subjected Plaintiff to discrimination, excluded Plaintiff from participation in the program or activity and denied Plaintiff the benefits of Defendants live streamed and archived video streaming service. As of this filing, the video content remains uncaptioned and inaccessible to qualified or otherwise qualified persons.

60. The international website standards organization, W3C, has published widely-accepted guidelines ("WCAG 2.0 AA") for making video content accessible to individuals with disabilities. These guidelines have been endorsed by the United States Department of Justice and by Federal Courts and the United States Access Board.

61. CITY OF WEST PALM BEACH's live streamed City Commission meetings and archived video recordings do not comply with the WCAG 2.0 AA guidelines because they are not closed captioned.

62. CITY OF WEST PALM BEACH has engaged in unlawful practices in violation of Section 504 of the Rehabilitation Act, 29 U.S.C. Section 794 since 2014. These practices include but are not limited to denying Eddie I Sierra, an individual with a disability who, with or without reasonable modifications to the rules, policies or practices; the removal of communication barriers; or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services to participate in programs or activities provided by CITY OF WEST PALM BEACH.

63. CITY OF WEST PALM BEACH has acted with deliberate indifference to the provisions of the Rehabilitation Act and Title II of the ADA in regards to the unlawful practices described herein because CITY OF WEST PALM BEACH is aware of the availability of auxiliary aids and services and fails to provide any such services, including but not limited to closed

development be given web accessibility training on a periodic basis calculated to achieve ongoing compliance with WCAG 2.0 AA;

- D. That Defendant create an accessibility policy that will be posted on its website, along with an e-mail address and toll-free phone number to report accessibility-related problems.
- E. Damages to Plaintiff as compensation for violating Plaintiff's rights under the Rehabilitation Act of 1973 and Title II of the ADA.
- F. Payment of costs of suit;
- G. Payment of reasonable attorneys' fees and costs, pursuant to 29 U.S.C. §794(a)(b) of the Rehabilitation Act; and
- H. Any and all other relief this Court deems necessary and just.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

Dated this 23rd day of March 2018.

Respectfully Submitted,

/s/ Juan Courtney Cunningham
J.Courtney Cunningham, Esq.
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U.S. Department of Justice
Civil Rights Division
Disability Rights Section



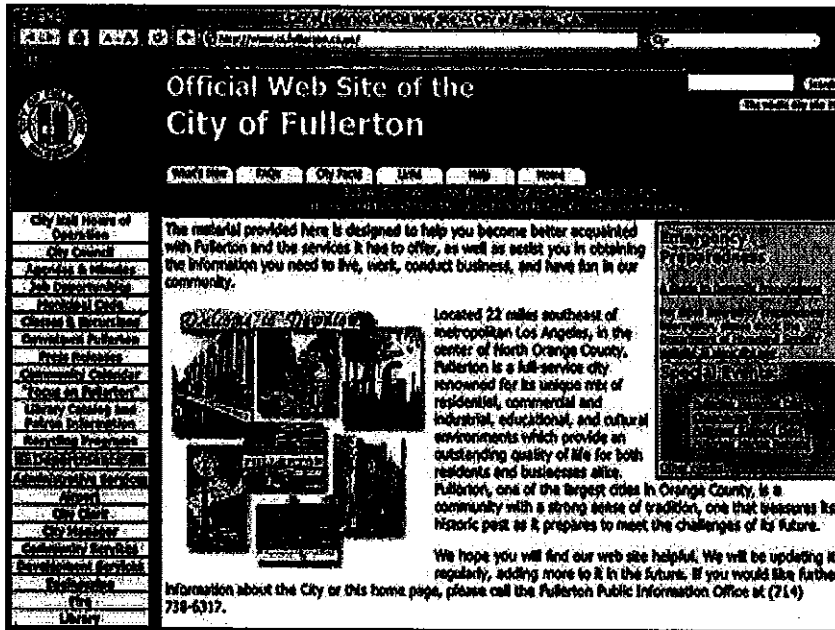
Accessibility of State and Local Government Websites to People with Disabilities

The Internet is dramatically changing the way that American government serves the public. Taking advantage of new technology, many State and local governments are using the web to offer citizens a host of services including:

- corresponding online with local officials;
- providing information about government services;
- renewing library books or driver's licenses;
- providing tax information and accepting tax returns; and
- applying for jobs or benefits.

These government websites are important because they:

- allow programs and services to be offered in a more dynamic, interactive way, increasing citizen participation;
- increase convenience and speed in obtaining information or services;
- reduce costs in providing programs and information about government services;
- reduce the amount of paperwork; and
- expand the possibilities of reaching new sectors of the community or offering new programs.



Local government websites provide important information and services to citizens

When government is constantly being asked to do more with less, the Internet is playing a vital role in allowing government to better serve all of its citizens.

The Americans with Disabilities Act (ADA) and, if the government entities receive Federal funding, the Rehabilitation Act of 1973, generally require that State and local governments provide qualified individuals with disabilities equal access to their programs, services, or activities unless doing so would fundamentally alter the nature of their programs, services, or activities or would impose an undue burden. One way to help meet these requirements is to ensure that government websites have accessible features for people with disabilities, using the simple steps described in this document. An agency with an inaccessible website may also meet its legal obligations by providing an alternative accessible way for citizens to use the programs or services, such as a staffed telephone information line. These alternatives, however, are unlikely to provide an equal degree of access in terms of hours of operation and the range of options and programs available. For example, job announcements and application forms, if posted on an accessible website, would be available to people with disabilities 24 hours a day, 7 days a week.

Online Barriers Faced By People with Disabilities

Many people with disabilities use "assistive technology" to enable them to use computers and access the Internet. Blind people who cannot see computer monitors may use screen readers – devices that speak the text that would normally appear on a monitor. People who have difficulty using a computer mouse can use voice recognition software to control their computers with verbal commands. People with other types of disabilities may use still other kinds of assistive technology. New and innovative assistive technologies are being introduced every day.

Poorly designed websites can create unnecessary barriers for people with disabilities, just as poorly designed buildings prevent some from entering. Designers may not realize how simple features built into a web page will assist someone who, for instance, cannot see a computer monitor or use a mouse.

One example of a barrier would be a photograph of a Mayor on a town website with no text identifying it. Because screen readers cannot interpret images unless there is text associated with it,

a blind person would have no way of knowing whether the image is an unidentified photo or logo, artwork, a link to another page, or something else. Simply adding a line of simple hidden computer code to label the photograph "Photograph of Mayor Jane Smith" will allow the blind user to make sense of the image.

Accessible Design Benefits Everyone

When accessible features are built into web pages, websites are more convenient and more available to everyone – including users with disabilities. Web designers can follow techniques developed by private and government organizations to make even complex web pages usable by everyone including people with disabilities. For most websites, implementing accessibility features is not difficult and will seldom change the layout or appearance of web pages. These techniques also make web pages more usable both by people using older computers and by people using the latest technologies (such as personal digital assistants, handheld computers, or web-enabled cellular phones).

With the rapid changes in the Internet and in assistive technologies used by people with disabilities to access computers, private and government organizations have worked to establish flexible guidelines for accessible web pages that permit innovation to continue.

Resources for Web Developers

To make web pages accessible, the web developer needs to know about web page features that can make a web page less accessible or more accessible. Information about such features is easily available and many software developers are adding tools to web development software to make it easier to make web pages accessible.

Two important resources provide guidance for web developers designing accessible web pages. One is the **Section 508 Standards**, which Federal agencies must follow for their own new web pages. To learn more about the Section 508 Standards:

- The Access Board maintains information on its website at www.access-board.gov and has a useful guide for web developers at www.access-board.gov/sec508/guide/1194.22.htm;
- The Department of Justice has information about accessible web page design in an April 2000 report to the President. This report is available at www.usdoj.gov/crt/508/report/content.htm, and
- The General Services Administration hosts an online course for web developers interested in accessible web design. This program was developed in conjunction with the Access Board, the Department of Justice, and the Department of Education and provides an interactive demonstration of how to build accessible web pages. This course is available at www.section508.gov, which also provides information about the Federal government's initiative to make its electronic and information technology accessible to people with disabilities.

A more comprehensive resource is the **Web Content Accessibility Guidelines** developed by the Web Accessibility Initiative. These guidelines help designers make web pages as accessible as possible to the widest range of users, including users with disabilities. The Web Accessibility Initiative is a subgroup of the World Wide Web Consortium — the same organization that standardizes the programming language followed by all web developers.

- Information for web developers interested in making their web pages as accessible as possible, including the current version of the **Web Content Accessibility Guidelines** (and associated checklists), can be found at www.w3c.org/WAI/Resources, and

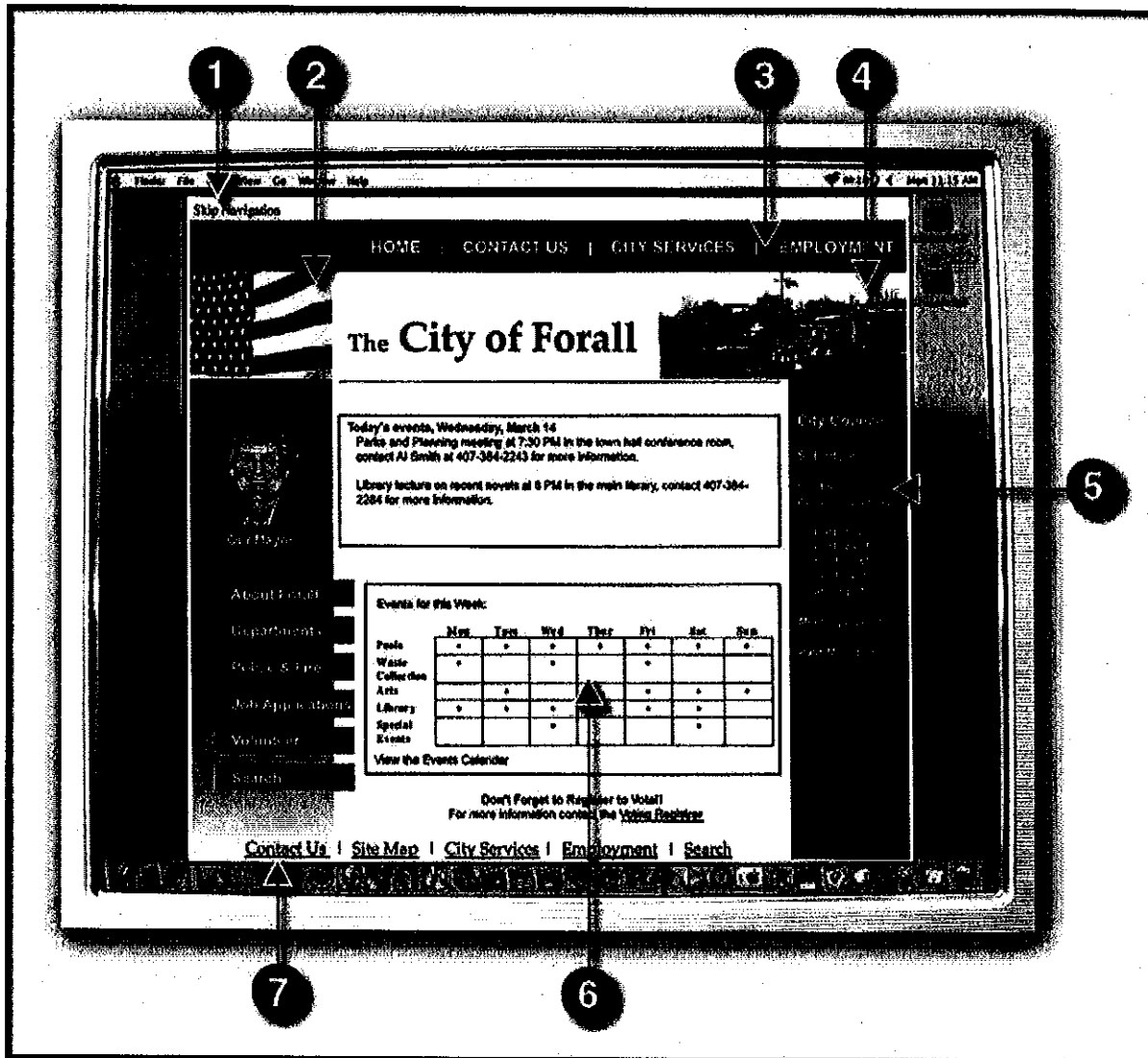
- Information about the Web Accessibility Initiative can be found at www.w3c.org/WAI.

Voluntary Action Plan for Accessible Websites

- **Establish a policy that your web pages will be accessible** and create a process for implementation.
- **Ensure that all new and modified web pages and content are accessible:**
 - Check the HTML¹ of all new web pages. Make sure that accessible elements are used, including alt tags, long descriptions, and captions, as needed.
 - If images are used, including photos, graphics, scanned images, or image maps, make sure to include alt tags and/or long descriptions for each.
 - If you use online forms and tables, make those elements accessible.
 - When posting documents on the website, always provide them in HTML or a text-based format (even if you are also providing them in another format, such as Portable Document Format (PDF)).
- **Develop a plan for making your existing web content more accessible.** Describe your plan on an accessible web page. Encourage input on improvements, including which pages should be given high priority for change. Let citizens know about the standards or guidelines that are being used. Consider making the more popular web pages a priority.
- **Ensure that in-house staff and contractors responsible for web page and content development are properly trained.**
- **Provide a way for visitors to request accessible information or services by posting a telephone number or E-mail address on your home page.** Establish procedures to assure a quick response to users with disabilities who are trying to obtain information or services in this way.
- **Periodically enlist disability groups to test your pages for ease of use;** use this information to increase accessibility.

¹ Web pages are written using a language called HTML (or "hypertext markup language"). HTML is a "markup language" that tells a computer program (called a "browser") how information will appear or will be arranged on a computer screen. HTML tags are specific instructions understood by a web browser or screen reader. ([back](#))

Examples of Accessible Features for Websites



Notes:

1. When navigation links are used, people who use a screen reader must listen to all the links before proceeding. A skip navigation link provides a way to bypass the row of navigation links by jumping to the start of the web page content. [\(back\)](#)
2. All images and graphics need to have an alt tag or long description. [\(back\)](#)
3. Use alt tags for image maps and for graphics associated with the image map so that a person using a screen reader will have access to the links and information. [\(back\)](#)
4. Some photos and images contain content that cannot be described with the limited text of an alt tag. Using a long description tag provides a way to have as much text as necessary to explain the image so it is accessible to a person using a screen reader but not visible on the web page. [\(back\)](#)
5. Text links do not require any additional information or description if the text clearly indicates what

the link is supposed to do. Links such as "click here" may confuse a user. ([back](#))

6. When tables with header and row identifiers are used to display information or data, the header and row information should be associated with each data cell by using HTML so a person using a screen reader can understand the information. ([back](#))

7. A link with contact information provides a way for users to request accessible services or to make suggestions. ([back](#))

For More Information

Technical Information Regarding Web Accessibility

For technical assistance regarding Section 508 Standards and how to make web pages accessible to people with disabilities, please contact the Access Board:

800-872-2253 (voice)

800-993-2822 (TTY)

Information about the ADA

The Department of Justice provides technical assistance to help State and local governments understand and comply with the ADA. An important source of ADA information is the Department's ADA Home Page on the World Wide Web. This extensive website provides access to ADA regulations; all Department ADA technical assistance materials, including newly-released publications; proposed changes in the ADA regulations; and access to Freedom of Information Act materials, including technical assistance letters. The website also provides links to other Federal agencies with ADA responsibilities.

In addition, the Department of Justice operates a toll-free ADA Information Line that provides access to ADA specialists during business hours.

ADA Information Line

800-514-0301 (voice)

800-514-0383 (TTY)

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June 2003

The Attorney General has determined that publication of this periodical is necessary in the transaction of the public business required by law of the Department of Justice.

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Last updated: October 09, 2008

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WAVE Help

What is WAVE and how do I use it?

WAVE is a tool to help web developers make their web content more accessible. **WAVE cannot tell you if your web content is accessible. Only a human can determine true accessibility.** But, WAVE can help you evaluate the accessibility of your web content.

Our philosophy is to focus on issues that we know impact end users, facilitate human evaluation, and to educate and inform about web accessibility.

WAVE is easy to use. Using the form at <https://wave.webaim.org/>, simply enter a the web page address of your page and submit the form. There are also [Firefox and Chrome extensions](#) for evaluating local, dynamic, or password-protected pages and [site-wide WAVE tools](#) for easily evaluating numerous pages.

What do all these icons mean?

WAVE will present your page with embedded icons and indicators. Each icon, box, and piece of information added by WAVE presents some information about the accessibility of your page. **While WAVE is most effective when used by someone knowledgeable about web accessibility, people who are not web accessibility experts can also benefit from WAVE.**

The report section at the top of the WAVE sidebar indicates if WAVE detected any errors or not. **The absence of errors DOES NOT mean your page is accessible or compliant.** RED icons indicate accessibility errors that need to be fixed. GREEN icons indicate accessibility features - things that probably improve accessibility (though these should be verified). The other icons and indicators, particularly the yellow alert icons, highlight other elements that you should look at. WAVE brings the underlying accessibility information of a page to the fore-front so it can be easily evaluated in context.

The goal should not be to get rid of *all* icons, except for the errors. Alerts will require close scrutiny - they likely represent an end user issue. Other icons are presented to facilitate human analysis of accessibility and structure of the page.

You can view a brief overview of what each icon means by clicking it and viewing its documentation or by accessing the documentation panel in the sidebar.

Did my page pass WAVE? Is it "WAVE approved"?

Only humans can determine whether a web page is accessible. While WAVE can identify errors (in other words, if you see a red icon, your page almost certainly has an accessibility issue), it cannot tell you if your page is accessible. For this reason, we never indicate that your page is accessible or if it has 'passed' WAVE. While we invite you to provide a link on your page to the WAVE report (or simply link to <http://wave.webaim.org/refer>), we do not provide any approval or certification indicators or badges.

What guidelines and standards does WAVE use? Section 508, WCAG, or both?

Our goal with WAVE is to support true accessibility and we have added as many tests for true accessibility as we can think of, including many checks for compliance issues found in the Section 508 and WCAG 2.1 guidelines. But WAVE cannot check

Add a WAVE link to your web page

If you'd like to provide a link to the WAVE report for your page, simply link to <http://wave.webaim.org/refer> from your web page or link to <http://wave.webaim.org/report?url=YOUR URL HERE> to process any URL explicitly.

Use the browser bookmarklet

For a quick and easy method of evaluating web pages in WAVE, you can install the following bookmarklet. It will add a WAVE item to your Bookmarks/Links/Favorites menu and/or toolbar. After installing the bookmarklet, simply browse to the web page you want to evaluate then select the bookmarklet item from the menu or toolbar. The page will be submitted to WAVE for evaluation.



WAVE To install the bookmarklet, simply drag the image to the left to your Links or Bookmarks toolbar. Or you can right click on the image and select "Bookmark this link" or "Add to Favorites".

Problems or feedback?

WAVE is not perfect. If you are having difficulties using WAVE or have feedback or recommendations, [please send us feedback](#).

Robinson, Claudene L

From: Harrison Peacock <harrison@seamlessdocs.com>
Sent: Tuesday, June 12, 2018 8:40 AM
To: Robinson, Claudene L
Subject: ADA Question for You

Hi Claudene

Looking at your website, it looks like there may be a number of forms & applications on the Riviera Beach, FL website that may not be compliant with the Americans with Disabilities Act (ADA). Residents who are visually or physically impaired may not be able to interact with these forms.

I'm reaching out from SeamlessGov and we've helped hundreds of local governments & agencies effortlessly convert their existing forms into ADA compliant versions, while also supercharging the internal business processes involved with intaking those forms, saving huge amounts of time and effort.

When would we be able to connect regarding this initiative?

Harrison Peacock
Solutions Specialist

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30 Vandam Street. 2nd Floor. NYC
855.77.SEAMLESS
<http://seamlessgov.com/>

seamless **GOV**

SeamlessDocs Raises 7.5M to Continue Enabling Government Innovation (GovTech.com)