



MEMO

Department

To: Finance And Personnel Committee

From: IT Manager Taplin

Date: 9/30/2026

Re: Digital Accessibility Mandate & Records Compliance (WCAG 2.1 Level AA)

Background information:

In April 2024, the U.S. Department of Justice finalized updated regulations under Title II of the Americans with Disabilities Act (ADA), establishing explicit, legally binding standards for state and local government digital services. Under this mandate, public entities must ensure their websites, mobile applications, and web-hosted public documents meet the **Web Content Accessibility Guidelines (WCAG) 2.1 Level AA**.

This standard ensures that residents with visual, auditory, motor, or cognitive disabilities can fully access municipal services—including screen-reader navigation for the visually impaired, keyboard accessibility for individuals unable to use a mouse, and closed captioning for broadcast public meetings.

Statutory Deadline

Because our city serves a population under 50,000, our official statutory compliance deadline is **April 26, 2028**.

While this timeframe allows adequate preparation, achieving full compliance requires significant lead time. The mandate applies not only to the main municipal website layout, but also to:

- **Interactive Web Portals:** Utility payment systems, permit applications, and GIS mapping tools (including those hosted by third-party vendors).
- **Public Documents:** All active PDFs, meeting agendas, council packets, minutes, and downloadable forms published on the website.
- **Media Content:** Public broadcast videos and audio recordings hosted on city platforms.

Key Risk & Mitigation Strategy

Proactively remediating our web infrastructure and digital document workflows protects the City from potential federal regulatory enforcement and legal liability. More importantly, it ensures that all residents, regardless of capability, can independently engage with city government, access vital services, and review public records online.

The following proposal outlines our recommended roadmap, software tools, and resource allocations to ensure full compliance ahead of the April 2028 deadline.

Social Media Archiving State Guidance

In June 2025, the Wisconsin Department of Justice Office of the Attorney General released an updated [Wisconsin Public Records Law Compliance Guide](#). This guidance explicitly clarifies that municipal social media posts, comments, and direct interactions qualify as official public records subject to state retention laws and open records requests. Because social media content can be edited, deleted, or hidden by users or network algorithms, standard manual backups are insufficient for legal compliance. Implementing an automated social media archiving tool is necessary to ensure the city fulfills its legal obligations under Wisconsin Public Records Law.

Strategic Plan:

Achieving WCAG 2.1 AA accessibility and implementing social media archiving directly advance the strategic plan's objective to Enhance External Communication. Ensuring accessible web pages and documents guarantees an inclusive user experience for all residents, fulfilling the city's mission. Meanwhile, archiving social media interactions enforces public record compliance and transparency, aligning with the core values of Accountability and Financial Responsibility.

Budget: The total Year 1 investment for all three compliance tools, including initial implementation and setup, is \$16,669.70. To maximize cost-efficiency, the City has partnered with Kaukauna Utilities, who will cover \$4,025.23 (one-third of the cost for the two web accessibility platforms). Moving forward, the total recurring annual cost will be \$20,487.40, with Kaukauna Utilities contributing an annual share of \$4,433.13.

Staff Recommended Action:

To identify the most efficient and cost-effective compliance framework, staff conducted a thorough evaluation of digital accessibility, governance, and record-keeping platforms across three industry-leading providers: **Siteimprove**, **Silktide**, and **CivicPlus**.

While all three vendors offer strong auditing capabilities, staff evaluated each platform based on functional coverage, administrative overhead, integration across municipal workflows, and overall long-term value to the city.

Recommendation

Staff recommends moving forward with the unified suite of compliance tools from **CivicPlus (Acquia Web Governance, DocAccess, and Social Media Archiving)**.

This selection is recommended for the following key reasons:

1. **Comprehensive, All-in-One Coverage:** Unlike standalone auditing solutions, the CivicPlus suite addresses every facet of our digital compliance mandate—web accessibility (Acquia), public PDF/document remediation (DocAccess), and Wisconsin Public Records Law compliance (Social Media Archiving)—under a single Vendor.

2. **Reduced Operational Overhead:** Utilizing a single vendor ecosystem streamlines administrative management, simplifies user access across departments, and eliminates the need to manage multiple vendor contracts and support pipelines.
3. **Targeted Document & Media Workflows:** CivicPlus provides specialized automation for complex municipal tasks—specifically PDF document remediation and near real-time social media record retention—that standalone web scanners do not fully address.

Adopting this suite will ensure the city mitigates legal liability, fulfills state public record obligations, and systematically achieves WCAG 2.1 Level AA compliance well ahead of the April 2028 statutory deadline.