

CITY OF MADISON
INTER-DEPARTMENTAL
CORRESPONDENCE

DATE: May 14, 2021

TO: Mayor Satya Rhodes-Conway and Council President Abbas and Council Vice-President Martin

FROM: Sarah Edgerton, IT Director

SUBJECT: **Accessibility and Equity Analysis of Allowing Video at Virtual Meetings**

Since switching to a virtual setting, the City of Madison has not allowed registrants to turn on their video during public meetings due to security and privacy concerns. In late 2020, the City received a formal complaint on the current registrant video policy. This complaint argued that the policy discriminates against d/Deaf and hard-of-hearing attendees, as it prevents them from reading lips during public testimonies.

This complaint prompted City staff, with assistance from Alder Abbas, to conduct a formal Racial Equity & Social Justice (RESJ) analysis on the policy. Deaf Unity, a Wisconsin organization that supports and advocates for Deaf and hard-of-hearing individuals, provided crucial guidance and input during this analysis.

Analysis was comprehensive, as the documentation reflects, and was completed over a four month time period. Two documents were produced for consideration. The first document, the RESJ analysis, focused on improving the accessibility of virtual meetings for d/Deaf and hard-of-hearing attendees. The second document, entitled “RESJ Analysis on Registrant Video and Virtual Meeting Accessibility” contains accessibility recommendations based on the analysis for registrant video, meeting procedures, and interpretation and transcription services.

City staff analysis and recommendations were focused on four categories:

1. **Registrant Video:** The initial complaint asked that the City allow registrant video so that participants could lip-read. By itself, lip-reading is not effective in virtual meetings, due to the low quality of the video. However, video does benefit d/Deaf and hard-of-hearing participants in other ways.

Key recommendation:

- If video is allowed, video must be optional for public registrants since not all registrants will be able to turn on their video (phone attendees, attendees with no camera). Registrants may also choose not to turn on their video to improve their audio quality (due to a low-speed internet connection), for privacy concerns, or for concerns about bias.

2. **Meeting Process:** These changes to the meeting process are recommended regardless of the decision on allowing registrant video. These recommendations outline broad changes that will improve meeting accessibility for many members of the public, and will set the stage for future improvements to the accessibility of public meetings.

Key recommendation:

- Reduce the number of committees: The City lacks the financial resources to support all meetings equitably. The current number of meetings prevents agendas from being published in time for residents to request interpretation and transcription services which then impacts their ability to participate in an equitable manner.
3. **Interpretation & Transcription Services:** These improvements to the City's interpretation and transcription services are recommended regardless of the decision on allowing registrant video. These recommendations outline improvements to our current interpretation services, and the path forward for providing effective transcription services. Interpretation and transcription are both crucial services that must be provided to provide equitable access to meetings for members of the public that are Deaf or hard-of-hearing (HOH) or have Limited English Proficiency (LEP).

Key recommendation(s):

- Provide live (human) transcription at all Type 1 meetings, and all other meetings upon request and modify machine translation resolution (RES-16-00741, Legislative File Number [34666](#)) to allow machine transcription.
4. **Budget Estimates for Transcription Services:** Estimates are based on quotes from a particular vendor, but final costs would depend on the chosen solution. This is simply for the services and hardware, and does not include staffing costs due to the increase in services.

Key recommendation:

- Costs could be mitigated by decreasing the number of committees and decreasing the length of committee meetings.

To improve accessible and equitable resident engagement, there would need to be a commitment to addressing one of the root cause issues that are a barrier for residents: the amount of boards, commissions and committees in the City of Madison. As a City, we should regularly evaluate our existing committee structure and be ready to adjust it based on the changing needs of our community. In 2019, the Task Force on Government Structure, a resident committee, identified the need for a reduction of boards, commission and committees to provide a more accessible legislative process. The City lacks the financial and staffing resources to support all meetings equitably.

RACIAL EQUITY AND SOCIAL JUSTICE TOOL

COMPREHENSIVE VERSION



Racial Equity
& Social Justice Initiative



Racial Equity and Social Justice Initiative RESJ Tool: Comprehensive Version



INSTRUCTIONS

Use this tool as early as possible in the development of City policies, plans, programs and budgets.

For issues on a short timeline or with a narrow impact, you may use the RESJ Tool – Fast Track Version.

This analysis should be completed by people with different racial and socioeconomic perspectives. When possible, involve those directly impacted by the issue. Include and document multiple voices in this process.

The order of questions may be re-arranged to suit your situation.

Mission of the Racial Equity and Social Justice (RESJ) Initiative: To establish racial equity and social justice as core principles in all decisions, policies and functions of the City of Madison.

Equity is just and fair inclusion into a society in which all, including all racial and ethnic groups, can participate, prosper, and reach their full potential. Equity gives all people a just and fair shot in life despite historic patterns of racial and economic exclusion (www.policylink.org).

Purpose of this Tool: To facilitate conscious consideration of equity and examine how communities of color and low-income populations will be affected by a proposed action/decision of the City.

The “*What, Who, Why, and How*” questions of this tool are designed to lead to strategies to prevent or mitigate adverse impacts and unintended consequences on marginalized populations.

BEGIN ANALYSIS

Title of policy, plan or proposal:

Allowing the public to turn their cameras on during virtual meetings for boards, commissions, and committees.

Main contact name(s) and contact information for this analysis:

Sarah Edgerton

Names and affiliations of others participating in the analysis:

From IT: Edgerton, Sarah, Anderson, Tanya; Commons, Zachary; Thompson, Deborah; Schraven, Joseph; Gibson, Michelle.

Common Council: Abbas, Syed, Alder

Arteaga, Gabriela facilitating from Building Inspection.

Storm, Kelly and Gorra Barash, Debra from Deaf Unity.

1. WHAT

a. What is the policy, plan or proposal being analyzed, and what does it seek to accomplish?

Accommodating deaf and/or hard of hearing people, people with disabilities, those who are neurodivergent, and people with limited English proficiency (LEP). The policy wants to make sure that meetings are fully accessible to as many people as possible. We already have an access notice in our meeting agendas--is that working/sufficient/being followed?

b. What factors (including existing policies and structures) associated with this issue might be affecting communities of color and/or low-income populations differently?

If we allow video, people without high-speed internet will be disproportionately affected--their audio and video will get choppy. Will be at a disadvantage to people who do have high-speed internet (and their video on). Older devices, including desktops, don't have video/camera to turn on. People who call in by phone don't have camera access.

Black communities often use different sign language than the one white people do (which is the standard). Having one sign language interpreter doesn't necessarily cover everyone.

Because of structural issues and ableism, people with disabilities are more likely to be low-income and have slower internet speeds.

Policy issues: ordinance forbids machine translation only. A human needs to look at it. Should we change the ordinance?

c. What do available data tell you about this issue? (See page 5 for guidance on data resources.)

Different people have different ASL skills. Some people only lip read, rely on body language, pace of communication, etc. The disparities are varied and difficult to place along racial lines.

Machine transcription is usually better afterwards than live.

From observing, people are receiving at 7-15 frames per second

At least one Alder is hard of hearing so limiting video limits the alder's ability to do their job. There are other alders for whom English is not a first language and they would likely benefit from transcription.

From deaf and hard of hearing advocacy groups: The chair, the person managing turn-taking and monitoring the chat box, the sign language interpreters (if applicable), the person talking should have their cameras on. Having camera on helps see body language, which helps people understand. Having too many cameras on is distracting for people who need to orient on to the ASL interpreter or the person speaking (especially in gallery view). Regardless of form of closed captioning, must reduce cross-talk for intelligibility. Cross-talk is also difficult for lip reading.

In Oct, allowed registered video officially in a PSRC video only while people were testifying. It went well according to the person staffing the meeting.

ADA is clear that we need some form of access.

Type 2 and Type 1 meetings have different requirements for turning on video (because of different platform uses, webinar vs meeting). To have video on in Type 1, staff would need to promote people to panelists--new permissions, disconnects person for a few seconds. Difficult for consistency.

Lip reading only conveys 40% of sounds -- not good enough on its own

d. What data are unavailable or missing?

A frame rate does video become useless (as far as interpretation or lip reading)? Anything less than --
What's our average frame rate? 10-15 on average
How much has Zoom been improving their closed captioning? 80% mark at yesterdays meeting (as an estimate). Zoom cannot give a percentage as far as how accurate their machine captions are. 90% accurate is the industry opinion.
Will be testing the accuracy of youtube machine transcriptiono in top 3 languages and ASL from the Police Chief interviews. For Spanish and Hmong, the accuracy rate was about 60%.
Pulling the data for frames per second reports from: daytime vs nighttime, tier 1 vs tier 2, over a few? months is too time intensive at the moment.
Over the last month Zach has been tracking if people are including contact info for the accessibility notice -- 55% include both phone and email.
How often do we get interpreter requests for BCCs? 25 requests in 2019
How would we address first amendment issues in person?
Does having a video of the person talking give more credence to what they're saying? Or less attention.
Does it influence bias (I can see this person, am I going to pay more attention)?

e. Which focus area(s) will the policy, plan or proposal primarily impact?

Please add any comments regarding the specific impacts on each area:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Community/Civic Engagement | <input type="checkbox"/> Food Access & Affordability |
| <input type="checkbox"/> Criminal Justice | <input checked="" type="checkbox"/> Government Practices |
| <input type="checkbox"/> Early Childhood | <input type="checkbox"/> Health |
| <input type="checkbox"/> Economic Development | <input type="checkbox"/> Housing |
| <input type="checkbox"/> Education | <input type="checkbox"/> Planning & Development |
| <input type="checkbox"/> Employment | <input checked="" type="checkbox"/> Service Equity |
| <input type="checkbox"/> Environment | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Other (please describe) | |

Comments:

2. WHO

a. Who (individuals or groups) could be impacted by the issues related to this policy, plan or proposal? Who would benefit?

Alders would benefit: Body language, frustration, feel more feelings from the community. Some people have an easier time expressing themselves through their body language--these community members would benefit, including community members whose first language isn't English. Deaf and hard of hearing folks. Neurodivergent folks who need more context to understand what people are saying.

Who would be burdened?

People with lower speed internet connections, no cameras, people calling in on phone only. People who aren't used to speaking in front of people and making eye contact, may be less likely to come to meetings (or could simply keep their video off). City staff hosting meetings as far as logistics (more difficult for Type 1 vs Type 2) and will have to be watchful if people have cameras on in case there's inappropriate behavior. People with families and especially children. People who don't want, or can't have, a virtual background--could breach their privacy. Not all devices allow virtual backgrounds. In terms of bias: Black people, people with disabilities, people whose apartments aren't up to minimum housing code.

Are there potential disproportionate impacts on communities of color or low-income communities?

Yes, see above

- b. Have stakeholders from different racial/ethnic and socioeconomic groups—especially those most affected—been informed, involved and represented in the development of this proposal or plan? Who is missing and how can they be engaged? (See page 6 for guidance on community engagement.)

We contacted Deaf Unity and they joined us on a meeting to look at recommendations. After the full RESJI analysis we are recommending (see additional document), it would be useful to have an end of meeting survey or adding a survey option to the confirmation email, social media, on the website. We also recommend connecting with NRTs to talk to folks who are involved in City issues but don't attend BCC meetings.

- c. What input have you received from those who would be impacted and how did you gather this information? Specify sources of comments and other input.

We have a complaint filed on behalf of someone who is deaf. The complainant had been personally petitioning to have their video turned on prior to making the complaint. Some of the data we had earlier was compiled primarily by advocacy groups largely made up of deaf and hard of hearing folks. We also spoke with Deaf Unity.

3. WHY

- a. What are the root causes or factors creating any racial or social inequities associated with this issue? (Examples: Bias in process; Lack of access or barriers; Lack of inclusive engagement)

Lack of digital inclusion: connectivity, digital literacy, and access to devices. Socioeconomic factors. Ableism. Racial biases.

- b. What are potential unintended consequences? What benefits or burdens may result? (Specifically consider social, economic, health and environmental impacts.)

You'd need strong internet connections: potential lower participation by people with lower internet speeds, or having to spend more money on internet, missing part of the audio.
Unintended bias if you can't see someone, unintended bias if you can see someone.
Deaf and hard of hearing folks may be able to more fully understand people's meanings. Also English Language Learners (ELL), neurodivergent people.
When we see someone in person or on video, we feel more connected to them. It may lead to people
May burden people who have difficulty being on camera.

- c. What identified community needs are being met or ignored in this issue or decision?

We're trying to meet the needs of d/Deaf and hard of hearing folks (plus others) - due to the request of a community member. We have not met with black d/Deaf and/or hard of hearing folks.

4. WHERE

- a. Are there impacts on geographic areas? (Select all that apply.)

- | | |
|---|--|
| <input checked="" type="checkbox"/> All Madison neighborhoods | <input type="checkbox"/> Park Edge/Park Ridge |
| <input type="checkbox"/> Allied Drive | <input type="checkbox"/> Southside |
| <input type="checkbox"/> Balsam/Russet | <input type="checkbox"/> East Madison (general) |
| <input type="checkbox"/> Brentwood/Northport Corridor | <input type="checkbox"/> North Madison (general) |
| <input type="checkbox"/> Darbo/Worthington | <input type="checkbox"/> West Madison (general) |
| <input type="checkbox"/> Hammersley/Theresa | <input type="checkbox"/> Downtown/Campus |
| <input type="checkbox"/> Leopold/Arbor Hills | <input type="checkbox"/> Dane County (outside Madison) |
| <input type="checkbox"/> Owl Creek | <input type="checkbox"/> Outside Dane County |

Comments:

5. HOW: RECOMMENDATIONS SECTION

- a. Describe recommended strategies to address adverse impacts, prevent unintended negative consequences and advance racial equity (program, policy, partnership and/or budget/fiscal strategies):

Please see attached document.

- b. Is the proposal or plan:

- Realistic?
- Adequately funded?
- Adequately resourced with personnel?
- Adequately resourced with mechanisms (policy, systems) to ensure successful implementation and enforcement?
- Adequately resourced with provisions to ensure ongoing data collection, public reporting, stakeholder participation and public accountability?

If you answered “no” to any of the above, what resources or actions are needed?

The proposal is realistic only if adequately funded and staffed. Many of these processes are not owned by any department. For any changes to be successful, staff need to be assigned to roles that they have the capacity to fill.

- c. Who is accountable for this decision?

The Common Council is ultimately accountable for this decision. Implementing an equitable process will require funding and staff time (please see attached recommendations document).

- d. How will impacts be documented and evaluated? What are the success indicators and progress benchmarks?

- How many meetings are following the protocols and best practices outlined in our attached document?
- Agendas are published in time for residents to request interpretation services
- Agendas contain the correct language about how to request services
- Are more people registering to speak, or watch, with accessibility needs/disclosing accessibility needs?
- What is the accuracy of AI transcription software at the start vs after six months? A year?
- Do we keep track of staff time?

Indicators of success could be:

- Number of meetings providing transcription, interpretation, and other services
- More people with accessibility needs (interpreter of any language) participating in the process
- A continued improvement of the AI transcription's accuracy
- Staff following meeting and agenda protocol
- Shorter meetings/fewer meetings

e. How will those impacted by this issue be informed of progress and impacts over time?

Deaf Unity should be kept in the loop with any recommendations that are implemented.

The City could also consider working with the Madison Association of the Deaf, if they are interested.

DATA RESOURCES FOR RACIAL EQUITY AND SOCIAL JUSTICE IMPACT ANALYSIS

City of Madison

- Neighborhood Indicators (UW Applied Population Lab and City of Madison):
<http://madison.apl.wisc.edu>
- Open Data Portal (City of Madison):
www.cityofmadison.com/data
- Madison Measures (City of Madison):
<https://www.cityofmadison.com/finance/documents/MadisonMeasures-2016.pdf>
- Census reporter (US Census Bureau):
<http://censusreporter.org/profiles/06000US5502548000-madison-city-dane-county-wi>

Dane County

- Geography of Opportunity: A Fair Housing Equity Assessment for Wisconsin's Capital Region (Capital Area Regional Planning Commission):
www.capitalarearpc.org
- Race to Equity report (Wisconsin Council on Children and Families):
<http://racetoequity.net>
- Healthy Dane (Public Health Madison & Dane County and area healthcare organizations):
www.healthydane.org
- Dane Demographics Brief (UW Applied Population Lab and UW-Extension):
www.apl.wisc.edu/publications/Dane_County_Demographics_Brief_2014.pdf

State of Wisconsin

- Wisconsin Quickfacts (US Census):
<http://quickfacts.census.gov/qfd/states/55000.html>
- Demographics Services Center (WI Dept of Administration):
www.doa.state.wi.us/section_detail.asp?linkcatid=11&linkid=64&locid=9
- Applied Population Laboratory (UW-Madison):
www.apl.wisc.edu/data.php

Federal

- American FactFinder (US Census):
<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>
- 2010 Census Gateway (US Census):
www.census.gov/2010census

CITY OF MADISON RACIAL EQUITY AND SOCIAL JUSTICE COMMUNITY ENGAGEMENT CONTINUUM

Adapted from *Community Engagement Guide: A tool to advance Equity & Social Justice in King County*

The continuum provides details, characteristics and strategies for five levels of community engagement. The continuum shows a range of actions from county-led information sharing that tends to be shorter-term to longer-term community-led activities. The continuum can be used for both simple and complex efforts. As a project develops, the level of community engagement may need to change to meet changing needs and objectives.

The level of engagement will depend on various factors, including program goals, time constraints, level of program and community readiness, and capacity and resources. There is no one right level of engagement, but considering the range of engagement and its implications on your work is a key step in promoting community participation and building community trust. Regardless of the level of engagement, the role of both the City of Madison and community partners as part of the engagement process should always be clearly defined.

Levels of Engagement				
<p>City Informs City of Madison initiates an effort, coordinates with departments and uses a variety of channels to inform community to take action</p>	<p>City Consults City of Madison gathers information from the community to inform city-led projects</p>	<p>City engages in dialogue City of Madison engages community members to shape city priorities and plans</p>	<p>City and community work together Community and City of Madison share in decision-making to co-create solutions together</p>	<p>Community directs action Community initiates and directs strategy and action with participation and technical assistance from the City of Madison</p>
Characteristics of Engagement				
<ul style="list-style-type: none"> Primarily one-way channel of communication One interaction Term-limited to event Addresses immediate need of City and community 	<ul style="list-style-type: none"> Primarily one-way channel of communication One to multiple interactions Short to medium-term Shapes and informs city projects 	<ul style="list-style-type: none"> Two-way channel of communication Multiple interactions Medium to long-term Advancement of solutions to complex problems 	<ul style="list-style-type: none"> Two-way channel of communication Multiple interactions Medium to long-term Advancement of solutions to complex problems 	<ul style="list-style-type: none"> Two-way channel of communication Multiple interactions Medium to long-term Advancement of solutions to complex problems
Strategies				
<p>Media releases, brochures, pamphlets, outreach to vulnerable populations, ethnic media contacts, translated information, staff outreach to residents, new and social media</p>	<p>Focus groups, interviews, community surveys</p>	<p>Forums, advisory boards, stakeholder involvement, coalitions, policy development and advocacy, including legislative briefings and testimony, workshops, community-wide events</p>	<p>Co-led community meetings, advisory boards, coalitions and partnerships, policy development and advocacy, including legislative briefings and testimony</p>	<p>Community-led planning efforts, community-hosted forums, collaborative partnerships, coalitions, policy development and advocacy, including legislative briefings and testimony</p>

NOTES

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RESJ Analysis on Registrant Video and Virtual Meeting Accessibility

Introduction

Background

Since switching to a virtual setting, the City of Madison has not allowed registrants to turn on their video during public meetings due to security and privacy concerns. In late 2020, the City received a formal complaint on the current registrant video policy. This complaint argued that the policy discriminates against d/Deaf and hard-of-hearing attendees, as it prevents them from reading lips during public testimonies.

This complaint prompted City staff, with assistance from Alder Abbas, to conduct a formal Racial Equity & Social Justice (RESJ) analysis on the policy. Deaf Unity, a Wisconsin organization that supports and advocates for Deaf and hard-of-hearing individuals, provided crucial guidance and input during this analysis.

The RESJ analysis focused on improving the accessibility of virtual meetings for d/Deaf and hard-of-hearing attendees. This document contains accessibility recommendations based on the analysis for registrant video, meeting procedures, and interpretation and transcription services.

Providing Effective, Accessible Services

No one solution can provide universal accessibility. Video (for lip-reading and other visual cues), ASL interpretation, and transcription are not equivalent services, and they cannot be substituted for one another. To make meetings accessible for all members of the public, the City needs to provide a wide variety of support options. One person we interviewed perfectly explained, “Everything has to be offered for everyone to understand.”

The City currently only provides interpretation, transcription, and other accessibility modifications upon request. The request process is burdensome and requires a lot of institutional knowledge. The City should work towards normalizing these services both by improving the request process and by providing services without request whenever possible. Requiring residents to request these services places a greater burden on those requesting them. Additionally, there are many people who would benefit from accessible services but would not request them. These people would also be better served if the City provided these services by default.

Improving the City’s meeting accessibility will have financial costs. Some of the recommendations in this document would require funding. To improve meeting accessibility, the City would need to devote resources to these recommendations, including funding, comprehensive training, and additional staffing. This document recommends steps the City can take to improve the accessibility of public meetings within a limited budget.

Accessibility is an ongoing effort that must be continuously evaluated and improved. These recommendations outline first steps that would move the City toward our vision of being Inclusive, Innovative, and Thriving.

Analysis Limitations

This analysis was limited in scope, and focused on the accessibility of virtual meetings for d/Deaf and hard-of-hearing participants. However, there are many more facets of accessibility that this analysis does not cover. Considerations outside the scope of this analysis include, but are not limited to:

- Barriers that prevent people from participating in government without understanding the legislative process, open meetings laws, and the City of Madison's current practices.
- Historical exclusion of marginalized groups from positions of power and from the legislative process, including: Black, Indigenous, and People of Color (BIPOC); transgender, non-binary, gender non-conforming, and other LGBTQ people; and people with disabilities.
- Using inclusive language in meeting scripts and other meeting procedures.
- Full analysis of interpretation and translation services (including Spanish, Hmong, Chinese, etc.).
- Methods for addressing limitations of physical meeting attendance, including taped video testimony.
- Times and physical locations of meetings, including barriers due to childcare needs, transportation, and the use of the Municipal Courtroom as a meeting location.
- Expectations of time commitments that are not be realistic for all residents.
- The accessibility of physical spaces and other considerations for in-person meetings.

One of the recommendations included below is to conduct a full Racial Equity & Social Justice Analysis on the meetings and legislative process, to address these issues and provide broader recommendations.

This analysis also did not involve BIPOC members of the Deaf community, who may have different service needs than white users of American Sign Language (ASL).

Registrant Video

The initial complaint asked that the City allow registrant video so that participants could lip-read. By itself, lip-reading is not effective in virtual meetings, due to the low quality of the video. However, video does benefit d/Deaf and hard-of-hearing participants in other ways.

Considerations for allowing registrant video:

- Allowing registrant video would assist Deaf and hard-of-hearing participants, neurodivergent participants, and participants with limited English proficiency in perceiving and understanding speech in meetings.
- Video would allow participants to see body language and connect with other attendees.
- Allowing committee members to see registrants may increase their perception of the registrants' credibility.
- Allowing face-to-face interaction between participants may increase civility in meetings.

Considerations for disallowing registrant video:

- Video was initially disallowed due to security concerns about display of offensive materials ("Zoombombing"). Both the City and the Zoom platform have made changes in the past year that lessens this concern.
- People with no or low-speed internet, people without cameras, and people calling in by phone would not be able to turn on their video.
- Allowing video may open registrants up to bias. There may be bias against registrants because of their race or other physical characteristics. There may also be bias against participants who do not turn their video on.
- Allowing video would open some privacy concerns. Video would allow participants to see inside registrants' homes, and potentially to see children or other family members.
- There would be differences in how registrant video is handled between Type 1 and Type 2 virtual meetings.

Recommendations for Allowing Registrant Video

If it is determined to allow registrant video, the following recommendations should be implemented.

Recommendation	Explanation	Considerations	Responsible Agency
Video must be optional for public registrants	Not all registrants will be able to turn on their video (phone attendees, attendees with no camera). Registrants may also choose not to turn on their video to improve their audio quality (due to a low-speed internet connection), for privacy concerns, or for concerns about bias.		Agency staffing the committee
Meetings will need a point person (i.e. Sergeant at Arms) to determine what video content is not acceptable	Technical Facilitators and Chairs should not be responsible for determining what constitutes free speech.	This may increase the number of staff required at each meeting. Attorney's Office must develop guidelines to determine what content is acceptable.	Attorney
Allow virtual backgrounds	Addresses some privacy concerns. Attendees could choose not to show the inside	Some attendees may use obscene, political, or other potentially	Mayor and Council Leadership

	of their home, any family members that walk by, etc.	<p>unacceptable content in their backgrounds (see <i>Sergeant at Arms</i>).</p> <p>Backgrounds can cause problems for attendees using visual cues.</p> <p>Not all devices support backgrounds.</p>	
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Meeting Process

These changes to the meeting process are recommended **regardless** of the decision on allowing registrant video.

These recommendations outline broad changes that will improve meeting accessibility for many members of the public, and will set the stage for future improvements to the accessibility of public meetings.

Recommendation	Explanation	Considerations	Responsible Agency
Reduce cross-talk by strictly following Robert's rules	Increases clarity for hard-of-hearing, neurodivergent, and Limited English Proficiency (LEP) attendees, and attendees using interpretation or transcription services.		Attorney's
Chair must recognize speakers before allowing them to speak	Helps attendees using interpretation or transcription services to identify who is speaking.		Attorney's
Consider which participants should have their video on	<i>Recommendation from DHH-RERC</i> : The chair, the person speaking, the clerk, and active sign language interpreters should have their video on. All other participants should have video off.	<p>Video is currently used to establish quorum.</p> <p>Members of the body wouldn't be able to see each other, including body language.</p> <p>Turning video on and off may add additional complexity to meetings, and may increase the time between switching speakers.</p>	Mayor and Council Leadership
Remind participants to sit in a well-lit area, make sure that their faces are well-lit and fully displayed on camera, and reduce backlighting	<p>Increases comprehension for participants using visual cues.</p> <p>Moving camera can be distracting and disorienting.</p>		Agency staffing the committee

Pause when interpreters are switching	Pauses ensure that attendees using interpretation services do not miss any information during the switch.	How will the meeting chair know when interpreters are switching?	Agency staffing the committee
Include more frequent short meeting breaks (i.e. Five minute breaks every two hours)	Reduces fatigue for attendees using interpretation services and attendees with disabilities.		Agency staffing the committee
Enforce that all agendas must be posted by noon on the Friday before the meeting at the latest, and require that agendas are posted online as well as physically	Not all committees currently meet this deadline. Posting agendas further in advance allows time to accommodate interpretation and transcription requests.	Update APM 3-2 (Meeting Notices), which only lists the 24 hours notification. This would codify recommendations and best practices as City policy. Many parts of this APM are outdated due to changes associated with virtual meetings.	Mayor and Council Leadership
Modify the City's policy to require that agendas are posted further in advance, and adjust internal processes to reduce the amount of time needed to fulfill interpretation and transcription requests	The Language Access Plan requires that requests must be made at least 48 hours before the meeting, which is not possible within the current agenda posting requirements.		Mayor and Council Leadership
Include mandatory interpretation language in agendas, and update the language to follow plain language guidelines	Not all agendas currently include this information. All meetings must have this available. Currently the language is at a post-graduate level. Many Deaf ASL users have comparatively lower English literacy levels.		Mayor and Council Leadership
If interpretation services are requested, make sure to take up the agenda item at that meeting, perhaps out of order	Reduces the cost of interpretation services.	Interpretation must be available for the full meeting if desired.	Mayor and Council Leadership
Reduce the number of committees	The City lacks the financial resources to support all meetings equitably. The current number of meetings prevents agendas from being published in time for residents to request interpretation and transcription services.		Common Council

Reduce the length of meetings	<p>The City lacks the financial resources to support meetings equitably.</p> <p>Reduces fatigue for attendees with disabilities.</p>		Common Council
Improve process and training on referrals	Excessive referrals require people to attend more meetings to speak on items that interest them.		Common Council
Conduct a full Racial Equity & Social Justice Analysis on the meetings and legislative process	This analysis was limited in scope and did not address many equity issues.	Include representatives from many agencies and from marginalized groups, especially BIPOC and people with disabilities.	Common Council

Interpretation & Transcription Services

These improvements to the City’s interpretation and transcription services are recommended **regardless** of the decision on allowing registrant video.

These recommendations outline improvements to our current interpretation services, and the path forward for providing effective transcription services. Interpretation and transcription are both crucial services that must be provided to provide equitable access to meetings for members of the public that are Deaf or hard-of-hearing (HOH) or have Limited English Proficiency (LEP).

Recommendation	Explanation	Considerations	Responsible Agency
Provide live (human) transcription at all Type 1 meetings, and all other meetings upon request	Lip-reading from video is not sufficient to convey meaning due to low frame rate.	Requires funding; see budget estimates below. Transcriptions must be requested more than 24 hours in advance, or the service will cost more.	Civil Rights
Provide machine transcription at all committee meetings where live transcription is not provided	This would allow Deaf/HOH attendees to participate without needing to request interpretation or transcription services. There are many people who would use captioning that would not request it.	Live (human) transcription is always preferred, and must always be available upon request.	IT and Civil Rights
Modify machine translation resolution (RES-16-00741, Legislative File Number 34666) to allow machine transcription	Required to provide machine transcription.	Only allow machine transcription for live video. Machine transcriptions must be reviewed before being made available for playback. Machine transcription must be a learning solution.	Common Council
Machine transcription must be a learning solution	Non-learning solutions are too error-prone.	Zoom’s transcription is not a learning solution.	IT and Civil Rights
Ensure that any transcription provided is available across all possible distribution methods	Includes all livestreams, Madison City Channel, Zoom meeting.	Would need increased staffing and budget to support.	IT and Civil Rights
Any recorded meetings that are transcribed should have transcription available for playback		Machine transcriptions must be reviewed before adding to playback – would require significant time from staff (est. 1.5 times meeting length). Would need increased staffing and budget to support.	IT

Continue to offer ASL interpretation	Transcription is not a replacement for an ASL interpreter. Many Deaf/HOH people don't use English fluently.		
Provide an easier way for the public to request interpretation and transcription services	Includes transcription (captioning), ASL interpretation, and spoken language (Spanish, Hmong, etc.) interpretation.	Would be a new IT project request. Requests should include which type of interpretation is requested (simultaneous vs consecutive). Participants using ASL interpretation at Type 1 meetings must be promoted to panelists.	IT
Requestors can't change their minds during the meeting and decide to have services for the whole meeting if they initially requested services for a certain agenda item.	Interpretive and translation services are acquired for the duration at request. It would be infeasible to require the interpreters/translators stay beyond that designated time.	Interpreters/translators may have other jobs lined up after their initial scheduled time. If they are asked to stay later than intended this would result in a scheduling conflict. Whether the City can line up an interpreter/translator for a whole meeting versus a single agenda item should be captured in the original request. Timeliness of requests can mean the difference of whether a request can be fulfilled.	Civil Rights
Provide Black American Sign Language (BASL) interpretation, and other sign languages upon request	ASL is not the only sign language. BASL is a distinct dialect used by Black communities.	This is currently available, but it is not widely known to members of the Deaf and Black communities.	Civil Rights

Budget Estimates for Transcription Services

These estimates are based on quotes from a particular vendor, but final costs would depend on the chosen solution. Costs could be mitigated by decreasing the number of committees and decreasing the length of committee meetings. This is simply for the services and hardware, this does not include staffing costs due to the increase in services.

Initial Costs

Item	Cost	Quantity	Total
Initial Hardware (per device) ¹	\$10,000	2	\$20,000
Total Initial Costs (First Year)			\$20,000

¹ This is the cost to rent the hardware for the first year. After the first year, rental costs would be included in annual maintenance.

Annual Costs

Item	Cost	Quantity	Total
Hardware maintenance (per device)	\$1,500	2	\$3,000
Human Transcription (per hour) ²	\$125	720	\$90,000
AI Transcription (up to 125 hours per month) ³	\$14,400	1	\$14,400
Zoom integration (per concurrent stream)	\$3,000	12	\$36,000
Total Annual Costs			\$143,400

² *Type 1 meetings*: average of 60 hours per month (range 34 to 88); 720 hours annually. (March 2020 – February 2021)

³ *Type 2 meetings*: average of 110 hours per month (range 71 to 131); 1,320 hours annually. (March 2020 – February 2021)