

Updates on FPPC Website- ADA implementation (AB434)

During the October 2021 Commission Meeting, staff reported that software (CommonLook) had been researched that could help implement the ADA requirement more effectively and efficiently. Since no additional funding was provided to implement this requirement, staff has been reallocating our state operation budget items to be able to absorb this additional cost. The one-time implementation cost is \$60,011 and the on-going cost through January 2023 is \$91,296.

It was reported at that 2021 meeting there are approximately 63,000 documents (advice letter 1974-present, manuals, enforcement stipulations, regulations, etc.) that were posted on our website. Direction to staff has been to remediate documents going forward. All documents published to the FPPC website after December 2021 have been ADA compliant, except draft versions of forms and manuals.

Staff sought approval from the Department of General Services to procure annual subscriptions of the CommonLook software license which has since been rolled out to staff for training purposes and then, ultimately, daily use to meet the requirements of ADA implementation. In December 2021, staff began training and working with the CommonLook Program.

On an ongoing basis, each division is responsible for remediating the following documents prior to publication to the website. Additionally, support staff for each division worked to update frequently used documents into templates that better meet the ADA requirements in order to help the remediation process be more efficient. Those documents are designated with “Template” below.

<p><u>Enforcement</u></p> <ul style="list-style-type: none">• Warning Letter Template• Closure Letter Template• Stipulation Template for both Main Line and Streamline	<p><u>IT</u></p> <ul style="list-style-type: none">• Annual Report
<p><u>Executive</u></p> <ul style="list-style-type: none">• Commission Agenda Documents• Committee Agenda Documents• Quarterly Report Templates (4 total)• Press Releases• Enforcement Summary and Hearing Release Template• Political Reform Act	<p><u>Legal</u></p> <ul style="list-style-type: none">• Regulations Template• Advice Letters Template• Advice Letter Report Template• Manuals (7 total)• All Forms (42 total)• FAQs• Fact Sheets

In April 2022, IT staff started participating in a monthly State Agency Web Accessibility Community of Practice and Forum, which was led by Department of Rehabilitation, to discuss and share strategies on implementing the requirement of the new law.

In general, implementing the ADA requirements require a large allocation of resources. The ADA CommonLook training and implementation requires each staff to spend many hours working on remediation of documents, which takes time away from completing the substantive work of each Division. Remediation, which is the process of making documents ADA compliant, slows down the preparation of: (1) letters, stipulations and other prosecutorial documents; (2) the compiling and posting of the monthly Commission meeting agenda; (3) the uploading of documents to the agency website to close out cases; (4) InDesign manual updates by the Education Unit; and (5) updating the website.

Below is the FPPC's implementation and on-going costs from December 2021 through January 2023 of implementing the ADA requirement.

CLASS TITLE	One-Time By Hours					One-Time Cost	On-Going By Hours					On-Going Cost	Total Hours	Total Cost
	Initial Training	Video Watching	Creating ADA Templates	Update Website with ADA Requirement	Updating all Forms ADA		Monthly on Remediating Documents	Monthly on Drafting Document CommonLook Word	Monthly on ADA Meetings	Monthly Helping others with ADA Questions				
Information Technology Specialist I	20	40	16	320		\$ 30,622			1	8	\$ 9,744	396	\$ 40,366	
Research Analyst II	2	4	20	40		\$ 3,550	12		1	2	\$ 11,295	66	\$ 14,845	
Assoc Gov Prog Analyst	15	35	10	35		\$ 4,414	16	3	1		\$ 13,010	95	\$ 17,424	
Staff Services Analyst	2	10	5	8		\$ 966					\$ -	25	\$ 966	
Mgmt Services Techn	0.5	0.5	2.5			\$ 124	1	3			\$ 1,989	3.5	\$ 2,113	
Assoc Gov Prog Analyst	3	12	40	20	24	\$ 3,354	0.5		1	1	\$ 1,565	99	\$ 4,920	
Mgmt Services Techn	8	20	2	1	2	\$ 1,071	20	0	1	1	\$ 10,643	33	\$ 11,714	
Staff Services Analyst	6	40		50		\$ 3,532	6	1	1	6	\$ 7,211	96	\$ 10,743	
Staff Services Manager II	4	40		10	10	\$ 3,363	5	2			\$ 3,051	64	\$ 6,414	
Staff Services Analyst	3	30			244	\$ 1,214	56		1	3	\$ 15,539	277	\$ 16,753	
Staff Services Analyst	25	10			181	\$ 1,288			1		\$ 405	216	\$ 1,692	
Staff Services Manager I	1	1				\$ 131	2.5				\$ 1,144	2	\$ 1,275	
Political Reform Consultant II, FPPC	2					\$ 108	1	1			\$ 753	2	\$ 860	
Political Reform Consultant I, FPPC	2	1				\$ 133	2				\$ 620	3	\$ 752	
Staff Services Analyst						\$ -	3				\$ 895	0	\$ 895	
Staff Services Analyst	1	1				\$ 77	2				\$ 541	2	\$ 618	
Staff Services Analyst	1	1				\$ 84	2				\$ 590	2	\$ 674	
Asst. Chief Counsel	1	4				\$ 576		2			\$ 691	5	\$ 1,266	
Attorney IV	10					\$ 1,163		5			\$ 1,745	10	\$ 2,908	
Sr. Commission Counsel-Spec	2.5	2.5				\$ 502	1.5	1.5	0.5		\$ 1,054	5	\$ 1,555	
Sr. Commission Counsel-Spec	1	8				\$ 812		3			\$ 812	9	\$ 1,623	
Sr. Commission Counsel-Spec	2	5				\$ 633	4	2			\$ 1,627	7	\$ 2,260	
Counsel - Enforcement	3	3				\$ 427	1	3			\$ 854	6	\$ 1,280	
Counsel-Enforcement	1	1				\$ 138	3	3			\$ 1,239	2	\$ 1,377	
Counsel-Enforcement	2	3				\$ 361		4	1		\$ 1,084	5	\$ 1,446	
Counsel-Enforcement	3	3				\$ 394	2	1.5	0.5		\$ 787	6	\$ 1,181	
Counsel-Enforcement	3	4				\$ 402		4			\$ 688	7	\$ 1,090	
Counsel-Enforcement	8	2			2	\$ 574	6	2	1	1	\$ 1,723	12	\$ 2,297	
Total	132	281	95.5	484	463	\$ 60,011	147	41	11	22	\$ 91,296	1456	\$ 151,307	
CommonLook Office License						\$ 15,306					\$ 15,306		\$ 30,612	
							Total Full Time Employee Total Staff Cost					1	\$ 181,919	