

Memorandum: Questions about Bloomington's 2026 ADA Transition Plan

Date: Oct. 11, 2026

To: City of Bloomington administration and Common Council

From: The B Square Bulletin

Re: Proposed 2026 ADA Transition Plan, Resolution 2026-22

The proposed 2026 ADA Transition Plan, scheduled for city council consideration on Oct. 14, updates Bloomington's efforts to make its facilities, services and programs accessible to people with disabilities.

This memo raises three issues. The first is a documented difference between the 2024 and 2026 plans. The other two concern city practices that deserve clarification. One is the public availability of records released under Indiana's Access to Public Records Act (APRA). The other is accessibility requirements for documents produced by outside vendors.

1. Disappearance of Zoom meeting accessibility guidelines

What the plans show: The 2024 plan included seven "Best Practices for Making Zoom Meetings More Accessible for People with Disabilities" (Appendix D, pages 46–47). The section is absent from the 2026 plan.

The seven practices were:

1. Ask attendees about accommodations.
2. Use live human captioning instead of automated captioning when captioning is an accommodation.
3. Provide a detailed agenda.
4. Make slides accessible to screen readers.
5. Avoid unexplained acronyms and idioms.
6. Have speakers identify themselves each time they speak.
7. Post presentation links in the meeting's chat window.

Possible explanation and alternatives: One conceivable reason for removing the section is the recommendation for live human captioning. That can involve expense and advance arrangements. Automated captioning has improved considerably. But there is no readily available evidence that this explains the deletion. Even if that recommendation needed revision, it would not explain dropping the other six.

Two practical additions to updated guidance could be:

- Always display closed captions onscreen in meeting rooms. That is, when a Zoom feed is shown on screens for in-person attendees, enable captions in that feed.

- Improve performance of automated captions. Some captioning systems support custom vocabularies. If Bloomington's setup permits it, a centrally maintained list of local names, streets, departments and acronyms could improve accuracy.

Sharing links and other information through chat windows during meetings is eminently feasible. In my experience observing Parking Commission meetings a few years ago, former city long-range planner Amir Farshchi routinely posted links, or text notes in Zoom chat as materials came up for discussion. That example suggests the practice can be incorporated into ordinary staff support for boards and commissions.

Questions

Why was the section removed? Was it an intentional policy change, or are the guidelines maintained elsewhere? If the human-captioning recommendation was the concern, why not revise that item alone?

What guidance currently governs captions displayed in meeting rooms, speaker identification, accessible slides and sharing presentation links during meetings?

Does the city's Zoom account or captioning service support custom vocabulary, and is that feature being used?

Would the city consider restoring the seven practices to the transition plan, with updated captioning guidance?

2. Accessibility requirements and public availability of APRA records

What the plan establishes: The city's digital accessibility guidelines state that documents uploaded to its website or otherwise electronically distributed to the public must be accessible.

Practice requiring clarification: My understanding based on personal experience is that the city does not routinely publish records it has already released to individual APRA requesters.

Whether accessibility requirements are a reason for that practice, and to what extent, is not established by the transition plan. However, there is a fundamental tension that should be addressed: Is the *availability* of records getting systematically sacrificed on the altar of *accessibility*? Otherwise put, can the city's policy be reduced to a preference that a document not even be publicly available, if it is not ADA accessible?

In any event, it's clear that publishing previously released records could reduce duplicate requests, improve transparency and make information easier to find. But doing so may also require additional accessibility work.

Questions

What is the city's written policy on making previously released APRA records available to the public generally? Has the city relied on accessibility requirements as a reason not to publish them? Is there a written policy or risk analysis addressing that question?

What distinction does the city draw between electronically providing a record to one requester and publishing it for everyone? Don't the same accessibility requirements apply in both cases?

If additional remediation is necessary before general publication, has the city considered a process for publishing records while meeting those requirements?

What would remediation cost, and how does the city weigh that cost against the public benefit and potential savings from avoiding repeated requests for the same records?

The policy question reduces to this: Can the city meet its accessibility commitments while expanding, rather than restricting, public access to government information?

3. Accessibility requirements for documents produced by outside vendors, others

What the plan establishes: The 2026 plan describes training, software and other resources the city provides to help employees create accessible documents and remediate inaccessible ones.

The plan does not establish whether comparable requirements are routinely imposed on outside vendors, or people who routinely submit material to the city.

Issue for consideration: Consultants, engineers, architects, software developers, other contractors, and land developers supply reports, studies, presentations, spreadsheets and other materials that become city public records. Establishing accessibility requirements when those documents are commissioned or received could reduce the need for later remediation.

Questions

Is Bloomington's legal department systematically ensuring that contracts, requests for proposals, purchase orders and other procurement documents require vendor deliverables to meet applicable accessibility standards? Is Bloomington's legal department systematically notifying petitioners that their plans and drawings have to meet accessibility standards?

Does Bloomington's legal department believe existing contracting authority permits such contractual provisions, or would an ordinance or formal policy be needed? Could these requirements become standard contract language, so the cost of correcting inaccessible deliverables does not routinely fall on taxpayers?

Especially for materials intended for public distribution, is it currently the case that vendors must supply accessible PDFs, properly structured electronic documents and usable original source files? Does the city check accessibility before accepting deliverables?

When a vendor submits an inaccessible document, who currently bears the cost of correction?
Can the city require remediation before final payment, or does it perform that work itself?

Has the city considered a policy or ordinance allowing it to deduct reasonable remediation costs from payments otherwise owed to vendors who fail to provide compliant documents? Such a provision could include notice and an opportunity for the vendor to correct deficiencies before costs are charged back.