



CAPLAW Webinar Transcript

Digital Content Regulations: Is Your CAA WCAG-Ready?

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[Savanna Arral, CAPLAW]

Welcome. I'm really excited for this webinar that we have for you today. You probably know me. I'm Savanna Arral. I'm a staff attorney here at CAPLAW, and I am very, very grateful to be joined by Erin Mastrantonio, who is the COO and Accessibility Director at Elevation, to talk to you today about digital content regulations and whether or not your CAA is ready for WCAG 2.1 AA. And if that sounded like a lot of word salad, this is the webinar for you. So this should be a fun ride. There's a lot that Erin's going to talk to you about, but I'm going to get started, I think, first with just a very basic overview of the legal landscape that's underlying all of the practical elements that Erin is going to talk with you more in depth about, starting with the statutory framework of digital accessibility and digital content regulations.

So, the two main statutes that underlie everything that we're going to talk about today are Section 504 of the Rehabilitation Act of 1973, and then Title II of the Americans with Disabilities Act. Both of these statutes, very long-standing statutes that prohibit discrimination on the basis of disability, but they apply slightly differently. So, Section 504 applies to organizations that receive federal financial assistance – federal grantees, CAAs – and Title II applies to states, local governments, and the departments, agencies, and instrumentalities of states and local governments. Public CAAs. If there are any on the webinar right now or watching the recording, that is exactly what you are most of the time.

So those are the statutes, and then the regulations. So you might remember earlier this year, when CAPLAW wrote an article talking about the recent rules that had been published in the Federal Register by the Department of Health and Human Services and the Department of Justice that implemented, Section 504 and Title II. And these regulations they added – I've got them right here – Subpart I and Subpart H to existing regulatory frameworks that implement those statutory frameworks, and added requirements around digital content and digital accessibility.

I'm talking to you about both of these because they are very, very similar, and there are many things that overlap with these regulatory frameworks. But they are different and separate, and they apply to different subsets of our network. So, the Department of Health and Human Services regulations that implement Section 504 apply to both public and private CAAs because they are federal grantees and receive federal financial assistance. And then the Department of Justice regulations that implement Title II apply to public CAAs only, by virtue of how Title II applies to our network.

The big thing to remember about – even if you don't remember all of the statutory and regulatory framework and where to find all of those particular laws – one of the big things to remember is that both of the final rules, the HHS rule and the DOJ rule, require that require compliance with WCAG 2.1 Level AA, which, as you can tell by me trying to trip over that, not my area of expertise, but it is Erin's. So I wanted to make sure that everybody understands that the basic requirement of the laws that underlie everything we're talking about today is the same. It requires compliance with this particular technical standard.

The organizations were originally required to comply with this technical standard starting in 2026, but you might remember in April and May of this year that the deadlines were pushed back to 2027 and 2028. I do want to point out that although these particular technical deadlines have been pushed back, the non-discrimination requirements in Section 504 and Title II of the ADA still apply. So there are still non-discrimination requirements that apply to your CAA, regardless and outside of this particular digital content framework that we're going to be talking about today.

And I already alluded to this as well, but between the two sets of regulations, if you actually read them and look at them side by side, many of the requirements are identical, but not all of them, I will say. So don't think that just because you've read one set of regulations that you've read both. I say this particularly for the purposes of public CAAs, where both sets of regulations will apply to your operations.

And then I did want to give a little bit of a preview of some of the things that are in the regulations themselves. In particular, both the HHS and the DOJ regulations talk about exceptions and when the technical standards don't apply to a particular area of content or a particular publication, for example. There are five exceptions in both sets of the regulations, and they're practically identical. The first exception is archived web content. Importantly, this is archived web content that is retained for the purposes of archival reasons. So it's not web content that is named archived, but not actually used in an archival way. And it also has to be identified as such, kept in an archived section of the website, labeled as archived, etc.

The second exception is for pre-existing conventional electronic documents. And conventional electronic documents is actually a defined term within both of the regulations, and it refers to a very specific type of file format, basically, which is PDFs, word processor documents, presentations, and spreadsheets. So conventional electronic documents that exist prior to an organization needing to comply with the digital regulations.

The third exception is content posted by a third party. But content posted by a third party, unless it is pursuant to a contractual licensing or other arrangement. So just because something is posted by, say, a partner organization, does not mean that your organization is exempt from needing to make sure that it complies with these technical standards.

The fourth exception is a fairly narrow one that people like to read broadly, but it's individualized password-protected documents or otherwise secured conventional electronic documents. And again, that definition of conventional electronic documents applies, but this is individualized, password-protected documents. They need to be both individualized and password-protected.

And then pre-existing social media posts. This is a big one for folks because they get really worried. You know, what if we put something on Facebook last week and it doesn't comply with the WCAG standards? That's okay because you're not actually required to comply with these standards yet. We're trying to give you this information with plenty of time for you to get your procedures up to snuff. So pre-existing social media posts that were posted before your CAA is required to comply with the HHS or Department of Justice regulations are an exception to the technical standards as well.

There are other provisions that are in these regulations that we definitely don't have the time to go into today. But I am more than happy to talk individually or in small groups with folks about. I've just kind of listed them here for you. Conforming alternate versions is a provision of both the HHS and DOJ regulations that talks about when it's allowable in limited circumstances to use alternative versions of content. Basically the rule is that when it's not possible to make that content directly accessible due to either technical or legal limitations. The equivalent facilitation rules, and then the duty to comply. So sometimes people will ask about the undue burden test. This is where the undue burden test comes in, as well as fundamental alterations to programs.

But what I really want you to take away from this slide isn't all of these legal terms and concepts. It's that this is a very tight regulatory scheme, and even though there are exceptions and alternatives and options for how to comply with it, the technical standards themselves are the meat of what you need to understand about what compliance means with these regulations. And

this isn't an area where you can just say, "Oh, well, we're just using a conforming alternate version, our non-compliance has minimal impact." Just using these words, this system, this regulatory scheme, is not set up in a way that you can kind of talk your way out of it, for lack of a better phrasing. So it's very tight.

It's very well supported by the statutory structure that it's built under in Section 504 in the ADA. And if you have any questions about the actual legal aspect of what we're going to talk about today, whether that's applicability to your CAA, public versus private – we all know that different CAAs have different corporate structures. Whether a certain document or part of your website meets an exception. "What exactly does equivalent facilitation mean, Savanna," or anything like that, you can feel free to reach out to CAPLAW. You can reach out to me, and we can talk about those things. But like I said, very happy to have Erin here to talk with you about the WCAG standards to really give you the information that you need to comply with the bulk of what's in the HHS and the DOJ regulations.

Last thing – I did mention that we wrote an article about this, but the article is available on CAPLAW's website in our resource library. If you have questions about this or you can't find the link, we will share it with you, and I'm always happy to talk about anything we've written as well.

[Erin Mastrantonio, Elevation]

Okay, well thank you, Savanna, for that really nice framework to set up this presentation. Hi, everyone. I'm Erin. Really glad to be here. Really honored to be here. I've worked with several Community Action Agencies in my role at Elevation in the scope of doing website redesigns. So I feel that I understand what you all are trying to do, and I have a lot of respect for what you all do. So I'm here today to really tackle this topic that I think generates a lot of fear, a lot of anxiety, especially now that deadlines are approaching.

And so, hopefully, today we're just going to demystify some of these topics. I'm going to not just talk about WCAG 2.1 AA, but also try to give you a framework around it so that you understand better what it's all about, other than just a list of success criteria to check off. So that's my goal today. And the disclaimer here: Savanna already helped me out by giving you this entire legal framework. So you know, I am not a lawyer, obviously. So this is something that you want to confer with Savanna and her team, when it comes to specific guidelines for what you need to comply with, and so you know that goes without saying.

Also, this information is accurate and current as of today. This is something that is evolving, so it is important to keep an eye on what's going on and check back with the CAPLAW team. You

know, just like the deadlines changed, we don't know what the future will hold. And so this presentation is really for educational purposes only. So let's just dive in now that we have those disclaimers out of the way.

And I like to start by defining what disability means. And so this is a surprise to some people that there are different definitions of what disability means or how we talk about disability. And really there have been three models that have evolved over time. The first one was the medical model, and this is the model that was really prevalent, like among doctors, among hospitals. And this really started way back in the 18th century, where the belief is that disability is defined by the physical state of your body. It's defined by your genetics. It is a totally personal attribute. And it defines the normal range of human ability. And that obviously gets us into trouble anytime we start talking about what's normal and abnormal. And making decisions based on that, that can lead to a lot of discrimination.

And so then in the 70s, we get this important movement that results in the social model of disability. And this model really took the focus off of the medical reality of people's genetic limiting factors, and really placed it on social attitudes and oppressive attitudes, stigmatization against people who are different. And so disability becomes more of a societal barrier than a personal attribute.

So there's really limitations to both of those models. They're both incomplete, and so today, what the WHO has adopted, starting in 2001 and onward, is something called the biopsychosocial model. That's a mouthful, but basically, it takes both into account, in addition to our attitudes about ourselves and environmental factors, which can be disabling. So this is a complex interaction of effects that take place with a human, and this is the most complete way of looking at disability. This is how we look at it at Elevation. This is how most sophisticated groups look at disability.

So, with that framework in place, I'm going to go through – before we get into the digital stuff – I want to showcase some examples of limitations of the built environment that you probably have come across, but they may not have affected you if you don't have the experience of living with a disability.

So the first, you know, you probably all experienced a building with no ramp. But if you're a wheelchair user, that is obviously a huge barrier. Also, you may have seen curbs with no curb cuts, right? So that's a few inches of design that can really exclude a lot of people – not just people carrying their luggage or people pushing strollers, but importantly people in wheelchairs.

Printed menus – that seems benign enough – but if you consider that a printed menu doesn't have a text-to-speech option, if it doesn't exist in digital form, it also doesn't have an alternative format like Braille for the blind. So now the barrier is lack of information rather than architecture. But lack of information can also be a barrier.

Alright, so I want to bridge over to digital barriers. What does it look like on a website? What are what are the equivalent experiences that people could have that are disabling on a website? Well, here's one: you come to a website and you're immediately met with a huge drop-down menu with lots and lots of pages. And let's say you're a keyboard user, and the only way for you to navigate a website is with the tab key. And now you're a captive audience to dozens and dozens of pages in a menu before you get to the main content, right? So that's a barrier in and of itself. Too much navigation.

We also have this phenomenon of color being used to represent meaning. So anytime an instruction relies on color alone, like here, where you say, "click the red button below." If you are a user that is colorblind or, as you know, the modern term for that is color vision deficient, that person would have no idea what you're talking about. So we never want to let color carry the meaning alone, since it's very subjective. So this is this is what that might look to you if you're a person with a color vision deficiency. The instruction here is not very usable at all.

And then this one: so people who are screen reader users, oftentimes the way they navigate a website is through a link list inside of their screen reader app. And when the linked text says "click here" everywhere, or "read more," or "learn more, there is no context to know what the person is clicking on. So, as sighted users, you know if you are a sighted user, you have the privilege of being able to skim and scan content. A non-sighted user does not have that privilege, so they've tried to find ways to shortcut their navigation through websites, and this is one of them. But it absolutely doesn't work if we don't have contextual link text, right? So that's a barrier.

And then this one. So, if you recall, if I go back to the slide I presented you with back here [shows blurry image of individual in a wheelchair with text that says "A flight of stairs, and no ramp or lift in sight.] and then we think about what that might look like to a person who is severely vision impaired or legally blind. I show this for a couple of reasons. One, someone who is legally blind doesn't necessarily see nothing at all. They usually would see something like this. [Shows blurry image with some amorphous blobs]. About 90% of them would see some rendering of shapes, maybe amorphous blob type outlines, and they have some sense of light and dark. But they really don't have any idea what's going on. And I show this also because so much of the advice you get about websites and the kind of content we put on them is well, put a lot of image content. Well,

honestly, a person who is blind is not going to be able to interpret any of that image content if it doesn't have alt text.

So this is not a problem if the image has a text descriptor. But if it doesn't, then it's a huge problem. And if it doesn't, oftentimes this is what a screen reader user will hear, right? Because blind users, they don't see the content, they hear the content. If you fail to put alt text, the screen reader will read the name of the file, which is oftentimes gobbledygook or something like this. So that is certainly a barrier.

So with that as an introduction to the kinds of barriers we come across in the digital environment, I do want to get to the guts of this presentation. Let's talk about WCAG 2.1 AA and the four principles that it is built on. Okay, so WCAG stands for Web Content Accessibility Guidelines, and I want you to think of this like a pyramid. So at the top we have principles that are referred to as POUR. These are the four core principles that make up WCAG, and I'm going to go over those in a second.

But under those four principles, we have guidelines. There's 13 guidelines, and then under those we have these testable objective statements called success criteria. In WCAG 2.1 AA, there are 50 success criteria, and this is what the ADA has adopted and says that we need to conform with. In terms of what the letters and numbers mean, so the 2.1 indicator is just the version number, right? So WCAG has been through an evolution. It started in May of 1999 with WCAG 1.0, and then about every decade since, just about, they have come out with a new version. We're actually up to version 2.2 right now, but that's not the version that the government adopted. So we're in version 2.1, and specifically we're in compliance level AA.

So these success criteria are broken up into three different levels of compliance. You're only accountable to level A and level AA. And the way that people normally talk about levels of compliance is difficulty level, or in terms of basic versus difficult to achieve. I would like to present it a little bit differently today. Compliance levels mostly have to do with universality of the principled. Can it apply to most content most of the time? Level A success criteria apply to all web content all of the time. They are the most foundational level. Level AA apply to most web content most of the time, so it's like 80/20 rule. AAA level – they apply to some content some of the time, so they were dropped from the standard.

So a good example of this that applies to your network would be, there is a success criteria that says – in the AAA level – that says you must define what acronyms mean the first time you present them. Well, that's not very difficult to do. You all use a lot of acronyms. I would encourage

you to do that, even though you're not legally mandated to. But you can see there, it's not difficult to achieve, but not all website pages have acronyms, right? So it's it has more to do with universality of content.

So anyway, the important point on this slide is you are held to 2.1 AA, and that's going to be the case for a very long time. You don't have to worry about the government deciding, "Okay, as soon as 3.0 comes out, we're gonna incorporate that." No, you know it will evolve over time, but for the time being, this is the standard that you're going to be responsible for.

Okay, let's jump into the four core principles because I really want you to get the underpinnings of WCAG. Like I said, it's more than just a checklist. So the four core principles, we refer to them through the acronym POUR, where P stands for perceivable, meaning can I perceive it with at least one sense. O stands for operable. So that has to do with if I am using something other than a mouse, can I still use this app or tool? Understandable is U, and that has to do with how clear, consistent, and predictable your content is. And finally R for robust. Does it hold across different browsers, different devices? Right, it has to work no matter what tool you're using to access the content. It should still work.

So those are the four principles, and I just want to go through these quickly one by one. So when I we talk about perceivable, a lot of the game of accessibility is making sure that all content is perceivable using at least one sense, and we exploit the sense that works well in that human. So if the vision isn't working well, we would default to hearing. An example of that is images that have alt text. Like I said, if you're a blind user, you're going to hear content rather than see it. The converse of that is, if the hearing is impaired, then we rely on the visual sense. So that's the case where we would apply captions to videos so that they can be seen by people who are deaf.

And then finally, what do you do if there is no vision or hearing that is working well? Then we rely on touch. And if you've ever seen a refreshable braille display, you'll know that words and sounds get translated into Braille on a keyboard that can be felt, so that applies to the deaf-blind. But this is generally really the heart of what perceivable means. We need to make sure that the content is available in at least one sense.

Under operable, the question we're trying to answer here is: "Can I interact with all of your content, either using a keyboard and mouse or some other assistive technology that mimics them?" And it's really fun to go to YouTube and look up all of the different devices that mimic a keyboard and mouse. Human ingenuity is amazing. You'll find things like joysticks, voice-activated technologies, head wands, mouse sticks, switch devices, which is a whole category that's really

interesting. But the point here is that there's many, many different ways to interact with a computer, and a keyboard and mouse are just two examples.

Keyboard and mice, you know, your mileage may vary. A mouse is a difficult thing for someone to use with arthritis. So, what are you going to do in that situation? Instead of using left and right click in your hand, you might use a pedal with two depressors on it to represent left and right. So as long as it's operable using some input device, that would satisfy this principle.

All right, so I want to take a quick pause here. I want to know. Speaking of keyboards, when is the last time that you tried to use your own website with only a keyboard? So Savanna is going to send out this poll. Is this sometime in the past month, sometime this past year? Have you never done this, or are you sitting there wondering? Wait, you can do that. So, key in your answer. I'll give you a moment. My bet is that probably most of us have never tried our own site by keyboard, but some of you. Have there are no wrong answers here, really.

I'm seeing lots of C's. I'm seeing to a lesser extent some A's and B's. I think that's wonderful. Anyone who has actually done that exercise, and I encourage everyone to do that today after we get off of this webinar. But yeah, you'll be surprised. I mean, the way that you navigate through a website is just with a tab key. So you start at the top, tab, tab, tab. If you want to go back up, shift tab, and it's really instructive to do that. You'll get a flavor of what it's like to be that person who has trouble using a mouse and can only use a keyboard.

Alright, so I do want to talk just a little bit about keyboard navigation here, and I took this little video, a screen recording from the CAA from Clarion and Jefferson Counties. If you're in the room, I really commend you. I think you have a fantastic website in terms of keyboard navigation. I'm very impressed. But when I talk about keyboard navigation, a lot of times I mention focus highlights, and I wanted to show you what that means. I also talk a lot about skip links.

So remember that barrier I mentioned before, where you have a very long navigation, and you have to tab, tab, tab through it. Well, if you have a skip link, which you'll see at the beginning of this presentation, than you can skip over that. But if you don't, you can see here what happens generally when you tab through. You can see what's called a focus highlight, and that focus highlight should be high contrast enough to be readable, and it should also follow in a logical order. So this is what WCAG mandates that we do – that we have these focus highlights.

What's interesting is that if you look at public sector websites and you try to find statistics about what percentage of public sector websites actually have focus highlights and are actually

accessible via keyboard, the first thing you'll see is that there is no data from the United States because the United States doesn't mandate that we collect or report this data. So I had to take this from the EU. But if you look at this study of over 1,100 UK public sector websites, 76% of them have no visible focus indicators. No way to know if you're a keyboard user where you are on the page. So that's obviously a barrier. We don't know what to click on if we don't even know where we are.

And then 64% almost have something that isn't operable by the keyboard at all, meaning it skips over it, there's no way to click on it, or you fall into what's called a keyboard trap, where you can't get out, and you just have to reload the page. So this is actually really common to have keyboard errors on a website, and it's fundamental that we make sure that our websites are navigable by keyboard-only users.

I presented some other statistics here. I'm referencing throughout the success criteria nomenclature, but generally you get the gist here that if you look at public websites in Portugal – this was a small sample size – but the majority of them are failing the keyboard test, failing the test to see whether there's visible focus highlights, and even the fundamental test about do those highlights go in a logical order, top to bottom, left to right. That is something that no automated checker can actually test. A human has to test that. Also, only 17% of the top million homepages have a skip link – that thing that allows you to skip over the menu – and one in 10 of those is broken. So that's from the WebAIM Millions report, which I'm going to dive into in a moment.

So for now, I want to get back and finish up these principles. So let's move on to understandable. Understandable, this principle has to do mostly with is your content clear? Is it concise? Is it written well and at an appropriate reading level? But it mostly has to do with predictability. So what do I mean by that? What I mean is that we want to keep our navigation and our icon use self-consistent. We want to always use the same labels for identical interactions. So if you have pagination menu, you don't want to have the word "next" on one, and then on the next page, you put the word "continue," right? Why would you break the pattern? We want to keep that consistent.

We also want to use the same icons to refer to the same type of information. Most people that use icons on the web kind of randomly slap them on wherever they seem to fit, but you can use them in a more intentional way, which is always making sure that they refer to the same types of information. Just like when you're driving down the highway and you see that picnic table sign, and you know you're coming up on a rest stop. It's the same thing on a website. We also want to follow norms for placement and function. I go to a lot of websites where the logo is not in the

upper left, or it doesn't link back to the homepage, or the cart symbol is in a weird location. People want to be avant-garde and they want to be different with their websites, but this is not the place to do that. You don't want to stand out in this way. You want to provide an experience that meets user expectations of what they normally get presented with when they go to websites.

So in terms of consistency, the two success criteria that really refer to this are 3.2.3, consistent navigation and consistent identification. And so they what they really refer to is that navigational items that repeat across pages must appear in the same relative order on every page. And then with the identification, talking about how we label things, we have to label things that function in the same way with the same labels, wherever those labels appear. So it's really equivalent to when you enter a room and the furniture moves, you have to reorient yourself a little bit. And this goes universally, this is a universal design principle. There is a cost to that reorientation. If you have a cognitive disability, that cost might be so high that you just bounce and leave the website.

Okay, now was anyone uncomfortable with that last slide? I mean, I just played it off like it was nothing, right? But that last slide, it was accurate. It had good information. It was legible, and it was totally unpredictable. I took away the progress indicator. I changed the colors. I changed the fonts. Didn't that make you a little bit uncomfortable? That's what someone with a cognitive disability experiences, right? So that's exactly what we don't want.

Okay. With robust, does your content work equally well on any operating system, browser, or device? So in the early days of the browser wars, we had certain functionality that would work only in Internet Explorer. We had others that would work only in Safari. And these regulations really put a stop to that and say, "Wait a minute, it shouldn't matter." There shouldn't be a profit motive to how well your content functions. So the way to ensure this is first and foremost we want to make sure we have valid HTML code. And you can put the HTML code behind your website through a code validator, and it will tell you if you have valid or invalid code.

It will also tell you if you have lots and lots of custom widgets without ARIA labeling. So if you haven't heard of ARIA, it stands for Accessible Rich Internet Applications, and it's really just a way that we can provide accessible names to things where the HTML code doesn't do a good job of providing an accessible name. So you may be familiar with what a div tag is, right? A div tag is a pretty generic tag within HTML. It's something that has come to dominate HTML code in the modern era, and it replaces things that are more descriptive, like button tags, right? So that's generally not a good evolution in terms of accessibility, and so because we can't really fight that wave, we beat it back by using ARIA, which is just another semantic language that does give it a more accessible name.

And then finally, ID attributes. So if you are a developer and you happen to know what an ID is,

you know within the CSS system. So every ID has to be unique on the page. It is an error to have two different IDs on the same page that are the same, and if that is the case, assistive tools won't know how to focus or target the right item. So these are just some examples of what would make your content not robust. Don't worry if you don't know what I mean by ID or class or CSS or HTML, it just works to understand that no matter what device you're using, what technology you're using to access the content, the content should load and function in the same way.

Okay, so now I want to dive into some common failures that we see, and where I'm pulling my data from, is this report that comes out every year called the WebAIM Million Report. What this does, is it does automated testing of the top million homepages on the web. When I say top, I mean, these are the most popular homepages that exist. These include a lot of brand names that you've probably heard of. So these are not obscure websites. And looking at the data year over year, it seems that the situation is getting worse and not better. So you can go look historically, and you can see, okay, what are the top accessibility barriers in the top million homepages in 2026? That data gets published early on in the year, usually around February. I'm showing you the February 2026 numbers here, and you can see the top six errors, and they really haven't changed for several years.

So the top error on the web is low contrast text. This afflicts about 84% of all websites. That has actually gotten worse since 2025. Missing alt text, over half of all images don't have any alt text, but that number is actually going down. So that's good news. It got a little bit better. Forms that are missing labels, links that don't have any text associated with them, buttons that have no text associated with them. I will give you examples of these in a moment. And then finally, missing document language where we fail to indicate what language our content is in, so that a screen reader knows what to read.

So these are the most common errors, and what's curious about these errors is that they're extremely easy to fix. They can be found by automated tools. So that's good news. But the bad news is that overall, we see about 96% of all pages tested have at least one detectable failure, and there are on average 56 errors in the average homepage, and that is up 10% year over year, and that's pretty awful. The reason why that's happening is because website homepages are getting longer, they're getting more complex, they're getting a lot more panels on them. So just sheer length of content is driving that up, but also complexity of content.

The takeaway here is that four of these six measures went up, so the open web is getting measurably less accessible, and obviously that's not a great thing. So I want to beat back against these, and I want to talk about the top six because these are going to be relevant to all of you.

These are something that you can go address right away. You don't have to have a lot of specialized knowledge to understand this, for the most part, and you also don't have to have any fancy, expensive tools to fix these errors.

Let's start with low contrast text. So this is text that cannot be distinguished from its background. WCAG officially says we need to maintain a contrast ratio of 4.5:1 for regular text, less so for large text. So they define large as 14 point bold or 18 point. You can see a demonstration of this on the left. So that final "Can you see me in the list?" has the same contrast as the "how about now," but the "how about now" is a lot easier to read because it's larger, right? That's why we have different thresholds for the different contrast ratios at different font sizes. So low contrast text is a major issue. 84% failure rate here. It is covered by success criteria 1.4.3 in the perceivable category, and there is an exception. In some of you may be sitting there thinking, "Oh, wow, we have text in our logo that's pretty light and doesn't meet this contrast standard." Interestingly, you don't have to go run off and change your logo. So text in logos is exempt. You do have to have alt text that has that text be accessible to a screen reader user, but that is a major exception you should know about. If the text is meaningless, if it doesn't carry any significant meaning, and the user never interacts with it, that's also exempt. But in general, you want to try and meet this 4.5:1 magic ratio. The 4.5:1 – what do the numbers mean? It's a brightness ratio of the pixels in the foreground to the pixels in the background. And there are lots and lots of tools that can measure this. I happen to use the color contrast analyzer tool by Vispero. There's really many that you could use, you know. So I'm not endorsing any one particular tool. So this is super easy to fix. A lot of design software also has automated contrast checking tools within it. At elevation, we use Figma. Figma has such a test for all of its designs, so that is something you could go in and fix right away.

Missing alt text, so I mentioned that over half of all images don't have alt text, or sorry, rather over half of all homepages have at least one image that is missing alt text. This is the very first success criteria: 1.1.1 in the perceivable category, if that's any indication of how important this is. What we want to do is always fill in the alt attribute for images and other non-text content. That includes icons, that includes input controls. There is an important exception here for images that are purely decorative. So remember what I said about a you know a screen reader user. They don't want to have their time wasted, so they really don't care that you have a textured blue background, they don't want to hear the screen reader read off a description of that. So there are some images we use on the web that are purely decorative, and accessibility advocates, surprisingly to some people, will tell us we don't want alt text there.

But it's not a good remedy to just say, okay, all of my images are decorative in that case. Well,

obviously, some images are not. You know, we have headshots for people on the team. We have infographics. Those are rich with information. These are the places where we need to put our attention. But any image really that carries meaning that the surrounding text does not, requires alt text. And I have an example here of someone holding cherry tomatoes.

This is an image that actually appeared on an Elevation website, and the original alt they had on it was “handful of cherry tomatoes.” Well, that is accurate, but it’s not very meaningful. We advised them on how to change this to something more descriptive, like “student holds cherry tomatoes picked from new organic school garden.” This happened to be a nonprofit dedicated to sustainable farming practices, so that carried better keywords, more information, more meaning, and that’s really what you want to do with your alt text. Okay, there is a free tool, many free tools, that can detect images that don’t have alt text in them. I’ve just listed one here. But it automatically highlights any images that are missing their alt text.

Alright, the next one, form labels. So it’s very common to have forms without labels and replaced with just placeholder text only. So you see on the left here, name, email, and phone. Sure, this takes up less screen real estate, but it’s totally inaccessible because screen reader tools generally don’t read placeholder text; they read actual labels. So this is covered under success criterion 3.3.2. This is in the understandable category, and this is something you just want to give to your developer and say, “Hey, we need to always put labels on our fields.” Particularly important on applications, registration forms, donation forms, but really you should have labels on every form. There are no exceptions to this, and you can use the free WAVE tool, Web Accessibility Evaluation Tool, by WebAIM to detect fields that don’t have labels.

Okay, empty links. So empty links is a major problem across the web. This again refers to the perceivable category, and it’s any time you have a link that has no text in between the a tag. A screen reader will just announce it as a link, the user won’t know anything about what it refers to. This failure was found on almost half of the top million pages. And where we find this mostly on sites in the CAA network, this is really common to see on social media icons, your program tile icons, your funding and partner logos that you put in your footer; those are oftentimes linked but have no text. You know, PDF downloads, linked hero images, and read more arrows. These are all places where links tend to be empty. So go ahead, instead of just putting the Facebook icon, go ahead and put the word Facebook next to the icon. That is really the remedy here, and so on and so forth.

With buttons – so buttons are sort of analogous to links, but they’re different. So a link is a thing

that takes you somewhere else. A button is a thing that keeps you on the same page but executes some action on that page. So same problem with buttons. There's lots and lots of buttons that have no text associated. Classic example is the magnifying glass button for your search. Typically people rely on a user's ability to recognize that as a magnifying glass and to know what that means. A screen reader, in this case, would just announce "button," so a screen reader user has no idea that is a search button. So, in addition to search buttons, we also find this on mobile menu icons, pop-up close buttons, carousel arrows, toggles for roll-out menus, like in your FAQ, and then your video play buttons. These should all be annotated so that a screen reader user knows what they are, other than just hearing "button," and you can again evaluate this with the WAVE tool.

Okay, missing document language. This one is inexcusable. It takes five seconds to fix by a knowledgeable developer. All you have to do is put in the HTML lang attribute so that the screen reader knows what language the content is in. There's a whole ISO standard. It's ISO 639-1 that gives us the language codes, and that's a very quick attribute to add to your HTML tag, so that a screen reader knows what it's dealing with. If we don't put this, then a screen reader might read Spanish content in an English voice, for example, without the proper accent. And it would probably mispronounce the words and letters that only exist in the Spanish alphabet, like the ñ or the é sound. So that's just one example, but this one there's no exceptions. This is something you could fix today.

Okay, so those are the six most common failures. I mean, this should be a good feeling that these are so simple to understand, hopefully, and also easy to fix. We can all make the web a much more accessible place. We're all in a position to materially shift these numbers through our websites.

Just before I move on from this section, though, because WebAIM Millions is based on automated checks, I want to spend a minute talking about the difference between automated and human checks. The gold standard is that we do both. Automated checks have value. The value that they have is they can detect lots and lots of barriers very quickly, and they tend to be able to detect the easiest errors to fix, and so they'll tend to detect lots and lots of errors by volume, but they won't be able to detect the majority of the types of barriers because there are some things that only a human can check.

For example, an automated tool can tell you whether or not you have alt text. It cannot tell you whether or not that alt text is actually meaningful and useful to the user. And you know, an automated tool can tell you whether your link or button has text associated with it, but it can't tell

you whether that text is contextual or whether it just says “click here,” “learn more,” “read more.” So, right, we have to have humans doing these checks. This is an inherently human activity. Accessibility is about humans. It needs to be done by humans. In fact, out of the 50 WCAG success criteria, there are only 17 that the working group within W3C has approved for having an automated testing rule. So if that’s any indication, it’s only about a third of the success criteria that can be checked by an automated checker. Like I said, it will still find the majority of errors by volume, but not by type. And there’s some really difficult ones to find that really just break the user experience altogether. Other ones: color as sole indicator, logical heading structures, keyboard flow and focus, and reading in content order, all of those things can only be found by a human. So, if you’re going to get an accessibility audit, you want to make sure that the firm that’s doing it is doing it in both ways. They should be doing automated checks, and they should also be doing manual.

Okay, now we get to the fun part. So when I was invited to give this talk, it was requested that I cover a few special topics for your network specifically. These are the topics that affect you because of the kind of content that you all have. So the first special topic is form accessibility. We’re going to dive a little bit more into that. I know I’ve already started to cover this with the top six, but we are going to go deeper. Then we’re going to talk about PDF libraries and tagging because I know a lot of you have a lot of your content tied up in PDF documents. And then we’re going to finish with embedded video and some things to keep in mind with that.

Alright, so let’s dive into topic number one: form accessibility. So lots and lots of forms on CAA websites, we have intake forms, eligibility forms, enrollment forms, in addition to donations and appointment requests. Basically forms are the front door to your programs, so they have to work. So again, recalling that statistic that over half of all forms have no label. I don’t have numbers for your network specifically; they don’t exist. But these are the kinds of issues that present the biggest barriers because the things that we want people to do on our websites mostly end in filling out a form and submitting it, right? All of your intake, your program enrollment, your eligibility screening, your volunteer signups are governed by forms. So this is this is really not optional.

Okay, I want to present to you what an inaccessible form looks like in more detail. Now, let’s say that we have a household intake form, and this is what a screen reader user would hear for the form that you see on the left. I’m just going to read this out in my most robotic voice possible. ‘Edit text: blank. Edit text: blank. Edit text: blank. Combo box, button, star.’ Okay, that is not an accessible experience, obviously.

Let me show you the alternative. Okay, so you now see here on the left a form that has full labels.

It also has which fields are required and which are not, with the full word required in parentheses. And then we have the title “search” instead of just the magnifying glass, and we have a descriptor at the bottom saying fields marked required must be completed. So this form was created with a screen reader user in mind. Notice the difference when I read the screen reader output: “full name: edit text required, email address: edit text required, household size: edit text required, county of residence: combo box, search button.” Okay. If you couldn’t see this form, now you would know what to do. You have the label. You have the action that you’re being requested to take, and then you know whether it’s required or not. You also know where the button is to click on to submit it. So same form, but now every field gets a fully accessible name. Nothing was redesigned here, really. The structure was just brought out.

Okay, I want to talk about some other ways that forms can break, other than those fundamental ways I just showed. So we talked about missing or placeholder-only labels. We also have this issue of error messages not being reported out correctly or being too vague. So we’ve all had that experience of filling out a form where we get the error message “an error occurred,” that does not meet the WCAG standard. Then we have things like radio and checkbox groups that don’t have a proper label. So now you don’t know what the answers are tied to, right? It’s oftentimes true that there is no field set or legend for those radio options or those check boxes, that’s a common problem. We also have missing autocomplete attributes. So probably a lot of you have your information stored somewhere in your browser that it can be called up instantaneously into a form that you have to fill out to save you time. Well, that is actually an accessibility accommodation that you have autocomplete features turned on in your forms.

So let’s look over here. I want to talk about error handling and what it looks like when it’s done properly. It is not sufficient to just say “error, please check your entries and try again.” Right. What is sufficient is to say what is wrong. So date of birth, enter the date as. So we’re putting here a recommended format, and then also giving an example. So the point here is we want to name the field, we need to describe the problem, and we need to suggest the fix. This is referring to WCAG 3.3.1 and 3.3.3. And you also want to put the errors where you place them. It’s important to put them next to the field where the error occurred. You don’t want to put them in a random location, and you never ever want to rely alone on a red outline, so that’s a really common problem. That would fall into the category of using color alone to convey meaning.

Alright. So this is the kind of thing you just want to hand off to your developer and say, “Okay, here’s your checklist. Make sure these things are true.” We want to make sure every input has a programmatically associated label. We have error names on the fields that describe the problem and suggest a fix. All of the things I just talked about. You can take this slide, hand it off to your

developer, and say, “Make sure this is true.” And yeah, that should mostly cover it for forms.

I want to dive in now to PDF libraries. So the law gives you a little bit more room here than you might think, but it is still important to go over this topic because I’ve seen many, many websites that over rely on PDFs. So let’s start with a poll, actually, now that we’ve got the chat working. I’m curious how many PDF documents are published on your agency’s website today. Do you know this number? And probably, this is a guess, but key in A through E. Do you have fewer than 50? You have 50 to 200, 200 to 1000. Let’s see what’s coming in. All right. So it’s all across the board. It’s looking like there’s a lot of A’s, but I have seen a few D’s, more than 1000.

[Savanna]

I’m seeing a lot of A’s. I’m seeing a lot of people certain that they know how many PDF documents are published on your agency’s website. So remember, E is an option for “I have no idea.” I was going to put E personally.

Yeah, yeah. I mean, I would guess most people probably don’t know exactly how many they have because they haven’t really done the full survey. So I do want to encourage everyone to go and actually check because you can’t triage a library that you haven’t counted. So just to give you an idea of what percentage of PDFs here are actually tagged for accessibility, in the one study that we have, which was self-report by federal agencies, and this only covers the quarter of the documents that they chose to test. This was a Section 508 assessment that was done. Only about 38% of those PDFs were actually tagged for accessibility.

Now I realize that I haven’t defined what that means. What does tagged means? So I’m going to go into that. But I do want to point out here that there is no study that we have, there is no statistic I can cite for you of, what percentage of the PDF library of a typical nonprofit is accessible. So the answers that you’re giving me today are really interesting information. It’s really the best data that we have. I would assume that most of your PDFs are not accessible. That’s a fair working assumption.

But the good news is that you don’t have to fix absolutely all of them. I will defer to the CAPLAW team, but I am referencing the statutes here. Both rules say in writing – and these are the specific sections that say and name the exceptions. So you don’t have to fix every PDF, but the ones that you do have to fix – so Savannah already covered what counts as a conventional electronic document – I’m here to tell you what doesn’t count and what does have to be accessible: web pages, images, and video, as well as all PDF documents that were created after the deadline for compliance, and any PDFs that were created before that compliance deadline, but that are still in

active use and are part of a user flow that is necessary to, let's say, submit an application. I know a lot of you probably have PDFs for your applications, and so I'm talking to you.

So specifically if we're talking about an annual report that was created, let's say back in 2019, sitting in a reports archive marked as an archive, you don't have to make that PDF accessible. But your LIHEAP application that was created back in 2019 – If you're still linking that from the apply page, that is not exempt. That does have to be accessible. Now that is the same file type, same age, totally different answer, right? So it really depends on the situation. What matters here is that every PDF needs to be reachable and accessible, and what that means for a PDF is to tag it.

I know I still haven't defined what tagging means, so let's talk about what PDF tagging looks like. So a PDF document, you can think of it just like a web page. It has what's called a tag tree. Exactly like a webpage has HTML tags, a PDF document has PDF tags, and they actually look really similar. I'm going to give you a moment to just compare the HTML tags on the left with the PDF tags on the right. You see, P is still P, h1 is still h1. Maybe the capitalization has changed, but obviously PDF tags are drawing a lot from HTML.

The important thing here to realize is that PDFs function exactly like web pages in that. They have a tagging structure that underpins them, and those tags have to be well formed, and they have to be in a logical order, and they have to be readable by a screen reader. The other thing that you need to know is that Acrobat does not do this reliably. It will add tags to your PDF document. It probably will not add them correctly. So what Acrobat does is it has an accessibility checking tool built inside of it. Now I'm talking about the paid Acrobat Pro. It also has a reading order tool, so it gives you the means to inspect and repair, but it does not actually produce the correct tags, and you're sitting there thinking, like, what is going on here? Why would Acrobat not be able to tag?

It really has to do with how we format information in the source document before we turn it into the PDF, right? So PDFs are things that result from exports, and so the most important thing you can do is actually to format things properly in your source tool so that it exports the proper tags into the finished PDF. And this is what's not happening the majority of the time. So important to know, there is a free tool out there, the PAC or the PDF Accessibility Checker, where you can look at your current PDF documents and check and see if they are properly tagged. This is a gold standard tool. A lot of digital accessibility specialists will refer to this tool. So you can go ahead and check that out.

But you need to know how an accessible PDF document is referred to. So we have the ISO standard 14289. We also have the PDF-UA that stands for Universal Accessibility. This is the

standard you want to refer to if you ever go to a contractor and say, “Hey, I want you to go ahead and make my PDF library accessible.” There are services that do that. You probably are going to end up relying on one at some point if you have a very large PDF library. This is what you want to put in your RFP for that work. You don’t just want to say, “Make my PDFs accessible.” You want to say, “Make them conform with the PDF-UA standard under ISO 14289.”

So let’s talk about Google Docs because Savanna told me that a lot of you all are using Google Docs as your source tool before you go ahead and export that into PDF. And so, yes, Google Docs does tag their outputs for accessibility. They started doing that in December of 2024. What survives in the export is quite a lot. So the heading levels get correctly labeled and nested, as long as you have actually used the formatting tools inside Google Docs instead of just typing your text and making it bigger when you want to make it a header. Go ahead and actually use the drop down that says, “this is an H1” or “this is an H3”. If you again go through the menu and say, “okay, this is a numbered list” or “I want to create a bulleted list instead of just manually typing in the asterisk.” Then Google Docs will know when it exports it, “Hey, we need to include this tag.” So if you have formatted it properly, the export will work. If you’ve done everything manually, it won’t. And so this is the biggest tip I can give you about PDFs. Make sure that you’re formatting it using the formatting tools in your source, and that gives you the best chance of having a properly tagged output. It’s not perfect; it doesn’t export everything perfectly, and this doesn’t carry over into Google Slides. Google Slides, I would not rely on for exporting to a PDF and relying on that to be accessible.

And when it comes to AI tools, a lot of you probably have used an AI tool to export a PDF. It doesn’t really know about tagging, and I’ve verified this myself. What AI produces as a PDF export is not accessible. There’s really no structure. There’s no tags. There’s oftentimes there’s no document language. So that that’s a major problem, that there’s not more awareness of this problem.

Okay, so it really matters. The tool that you author in will decide your result to a large degree. As I just mentioned, export quality is a function of authoring quality. So use those real headings. You know, make sure that you’re including alt text because alt text in, alt text out. Nothing in, nothing out, right? So, and this is the other important thing to know: if you download the file as a PDF, you’ll get your tags in the output. If you “print save as PDF,” it will destroy all of them. Don’t ask me why this is so, but this is so. If you want to do a quick check to see whether your PDF files are tagged, you can go into Acrobat, go into the View menu, Show Hide, Navigation Panes, and then look at your tags. If it says there are no tags available, then your document isn’t tagged, and that means you have an issue if that file is indeed in some important workflow.

Alright, let's talk about scans because a lot of time people will scan to a PDF. They'll take an application or they'll take a form. When you make a scan, oftentimes, that scan is going to end up as an image. And that image – a lot of people think that they'll paste it up on the website, and sure, a sighted user can read that, but all of the text now lives as pixels in that image. So really if you then convert that to a PDF, there's really nothing to tag because all of the text has been flattened into pixels. So then you have to go through the trouble of OCR-ing it. Then you have to tag it. Then you have to verify that. The easier thing is to just create your forms as actual web forms using HTML. I see a lot of scans in the CAA network for things like weatherization applications, your event flyers, your program reporting, your impact reporting, so it's really important to know that this is not ideal. We don't want to be scanning things into images.

Generally, you never want to have text as pixels. So then you'll probably say to me, "But Erin, AI can read my PDF documents and my images just fine." Well, sure, it looks like it can, but I'm here to tell you that it can't do it in the way that you think. It doesn't read as well as a web page. It's not nearly as accessible and citable. And by accessible in this case, I mean AI has a really difficult time because you're giving it extra steps to do. And AI is lazy at the end of the day. AI wants to find its sources as fast as possible, and it's going to take data from the sources that it can cite as easily as possible. Just know that when AI is reading a PDF document, it knows that PDF documents are usually untagged, so it's not even looking for tags. It's actually treating all of them as images and pulling out the raw text using image processing, which is a very imperfect process. It's a slow process. It is not reliable. So in this case, AI is always going to favor what's easy to use. You want to have artifacts that are easy to extract, and that is going to carry a lot more weight if you want to be visible and citable in AI. So make sure your best information doesn't just live in PDFs.

Before the compliance deadline, you want to slowly start moving your PDF documents into actual webpages and coded forms. This is probably not something you're going to do in house because it is very time consuming. I have attempted to learn this myself and do it myself, and I came to the conclusion, as you might, that it's really something that is better to be contracted out. Again, just like with accessibility audits, you want to make sure that you're doing both programmatic and manual remediation of your PDF documents.

How much does it cost? Well, these are numbers from March of this year. It really ranges by the complexity of the content on the page. I've seen numbers cited anywhere from \$1 per page up to \$11.50 per page. I'm citing here a University of Illinois Chicago study of multiple vendor rates. It averages to around five to \$8 per page, but again, that's just an average. But that tells you, if

you've got 1000s of PDF documents, this is something you're going to have to budget for. And since you have a little bit of time now that the deadline has moved, I definitely would include this in your in your budget. So when you're talking to vendors, you want to ask for per page quotes. You want to ask whether there is a manual review included. That's very important.

Okay, I'm going to go into the last special topic here, and we'll see if we have time for questions. I'm trying to leave time. I promise. Okay, so with embedded videos, there's a lot going on here. So just like images, video also needs text alternatives. The kind of information that comes through in a video really comes through four different channels. So let's take them one by one.

When we think about media, what actually exists in media files is we have the spoken audio component. For people who are deaf and hard of hearing, they cannot reach that, so we apply captions as the affordance. Then we have another channel of information. We have non-speech audio. These are the sounds. These are the soft whispers. These are the door slams. Again, deaf and hard of hearing folks can't get that, so that's why we have audio description. That's the brackets that you see included in captions. Really important, people think of this as optional. It is not optional. It's part of the information that brings meaning.

Then we have the visual-only information, right? So in videos, we've got charts. Sometimes we have on-screen text. We have actions, and those are not always narrated. So if you can't see, if you're blind or low vision, then you need audio description of that visual-only information. And then, if you're a deaf-blind user, you can't access any of that if you're on a slow connection. Let's say you have slow Wi-Fi, you don't have 5G, you live in a rural area. You're also not going to be able to access any of that. The reason I've highlighted this one at the bottom is we really need a descriptive transcript. That is the affordance that is the granddaddy of all affordances for media, having a transcript with integrated description.

So I want you to think of media accessibility again as a translation between senses, just like we talked about before, and I do want to spend a moment on captions and transcripts because they are not the same thing. In the old days, we would start with the transcript because the transcript is not time synchronized. So transcript is the words that are spoken along with that extra audio description. And then people would take that and break it up into little segments that had timestamps on them. Now it's reverse – it's the other way around. People will oftentimes go into YouTube and Vimeo and caption their videos first, and then auto-generate a transcript out of that.

So they're not the exact same thing. The main difference: captions are time synchronized, transcripts are not. Captions really don't have speaker labels. Transcripts do. You have to identify

who's speaking in a transcript because you can't see that. But people think of them as part and parcel of the same thing. And I will tell you once you have your captions on your file, YouTube will auto-generate you a transcript. None of this is something that you should rely on, the automated YouTube algorithm or Vimeo algorithm. They all need correction. And if you do this, this will not only help your content to be more accessible, it improves comprehension. If you're an ESL listener, if you speak English as a second language, we have many studies showing that it increases engagement also to add captions, and it also boosts your video SEO. If you have a full transcript with all of those rich keywords, now search engines can understand your video content and rank it. It's important to know that deafblind users can only reach a transcript. They can't consume audiovisual data in any other way. So transcripts, if you thought of them as an optional step after you got your captions done, they are definitely not optional.

I'm going to go on here to talking about audio description because again, people think of this as extra credit. This is actually something you are responsible for in the level AA criteria. It wasn't mandated at level A, but it is mandated at level AA. So you have to ask yourself: Does your video convey any information visually that isn't spoken. If it doesn't, then okay, you can just take verbatim like the words that are spoken and put those in your captions. If it has any information that is visual only, then you need to add a description for that in the text or just say it aloud in the video. That's what we refer to when we talk about integrated description: it's being able to include everything that's happening in the narration.

Okay, I can see that I'm running short on time. So last few slides here. Embedded players-they don't have a download transcript button. You have to go out to YouTube for that. That is by design. That is awful, but that is true, and it's not in their product roadmap to add it anytime soon. So, if you want to have a perfectly accessible video on your website, then you have to have a download transcript link or button somewhere near to that video.

Also, know that if you rely on auto captioning, you're going to have a lot of your content being inaccurate or not fully captured. If you look at the statistics and just do the math, even if you assume that the captioning algorithms are 90% accurate, which they certainly are not, they are well below that. You're going to have less than half of your eight-word sentences will be fully transcribed correctly, and this is from a 3Play Media study. 3Play Media is a very prominent captioning and transcript vendor, and they even admit that this is the case.

When you're budgeting time for how long it will take to add or correct captions in a video, you want to do it in multiples of runtime, not minutes per video. It usually takes about five to 10 times

the video's runtime to add or correct captions. Things that are routinely omitted: speaker identification, non-speech audio, punctuation, and your CAA-specific vocabulary. So we have mangled acronyms here like LIHEAP, CSBG, weatherization, Head Start. These are special things that need to be corrected.

And then finally, this is a checklist for your developer. I don't have time to go through all of them, but make sure – and this is a little tip I got from the Hearing Loss Association of America – make sure the speaker's face is lit so that lip reading is possible. Nobody thinks about that. That's really important. There's a lot of other techniques we can use that you can hand to your developer. Talking about making sure the iframe for the video has an accessible name, that we're not autoplaying it, that we're not flashing anything. For folks with photosensitive epilepsy. Flashing content is obviously a barrier, and it can really be a health risk.

So, I think I think that's where I'd like to stop. Again, I like to end on what you don't have to do. Savannah already gave a few of these, but you know you don't have to worry about those pre-existing documents. Any third-party content that you don't have a licensing arrangement about that's excluded. Don't worry about WCAG 2.2 and 3.0. No alt text for decorative images. Archived web content that is marked as archive, pre-existing social media. Sign language interpretation – that is level AAA, not AA. You don't have to worry about necessarily going off and hiring ASL interpreters, but that is a wonderful thing if you can do it. Any level AAA success criteria generally, and then your text inside logos.

I want to thank you for your attention in this extended webinar, and I'm really just again very honored to be invited here, and I'm willing to answer your questions over. My email is listed there, so apologies for taking up the entire time and a few minutes over.

[\[Savanna\]](#)

No, this has been wonderful, thank you so much Erin. I feel like every time I talk to you I learn something new about this as well and everybody at CAPLAW has been very excited for this webinar, and for us to be a part of this and to learn from you. Because there are limits to what the lawyers can talk about, but there are no limits to what our CAAs and our network need in terms of support so it's always great when we can have experts in other areas join us.

I did see there were a couple of questions in the chat but like Erin said, you can feel free to email her. And you can feel free to email CAPLAW if your question is on the more legal side. If you aren't sure which side it falls on, email CAPLAW and we'll pull Erin in. A couple people also asked about recordings. We will have a recording, as well as a transcript – we always do – available

in our Resource Library once we're able to put that together. And that will go out to everyone who registered for the webinar. So if you have a coworker who registered but had a last-minute meeting scheduled or had to jump off halfway through, we will be able to email them the information so they can watch this in full.

So thank you again for joining us, thank you to Erin, and have a great rest of your day.

[Erin]

Yeah, thank you. Thank you, everyone. Bye bye.