

Testimony of Peter L. Fritz

Before the Access Hawaii Committee

Subject: Accessibility of Agendas Posted to the State Calendar

Submitted in a Personal Capacity as a Citizen

Chair and Members of the Committee:

My name is Peter L. Fritz. I submit this testimony in my personal capacity as a citizen. I was involved in the earlier decision that permitted agencies to paste agenda content directly into the state calendar page. I write to explain why that practice should now change.

The paste practice was adopted to solve a specific problem. At that time, agencies created agendas using a variety of programs. Many of those programs produced PDF documents that were images of text. An image of text cannot be read by a screen reader. Pasted text on the calendar page was more accessible than an inaccessible image. Pasting was a reasonable response to the tools then in use.

Committee Oversight of the Portal

The Access Hawaii Committee oversees the State's Internet portal. The state calendar is part of that portal. The accessibility of the material posted on the calendar is a proper subject for this Committee.

The Original Justification No Longer Applies

The conditions that justified the paste practice have changed. The State adopted Adobe Acrobat as its standard. Adobe Acrobat can produce a readable, tagged PDF rather than an image of text. The problem that pasting was meant to solve can now be solved at the source.

The paste practice now creates its own problem. Pasting agenda content into the calendar page removes the heading structure of the document. Content without heading structure is difficult for a screen reader user to navigate. The workaround now produces a form of the inaccessibility it was adopted to avoid.

There is a further problem. An individual with a disability cannot be required to take extra steps to obtain information that an individual without a disability obtains simply by reading the main calendar page. In some instances, the pasted content did not include information on how to request an accommodation. A person who relied on the calendar page could not obtain that information there. This is a disability accessibility problem regardless of whether it is also a Sunshine Law violation.

This practice may also fail to provide effective communication, because it does not convey the meeting information to a person with a disability as effectively as it conveys it to others.

Accessibility of the Agendas Reviewed

I reviewed the agenda for this matter in two forms. The first is the agenda pasted on the calendar page. The second is the agenda included in the board packet as a PDF document. Neither is free of accessibility issues. The attached findings identify each issue and the WCAG success criterion that was not met. The findings are stated separately for the calendar page posting and for the packet agenda.

These findings are the product of my review. They represent my understanding of the applicable WCAG success criteria. Some determinations depend on manual evaluation, and reasonable evaluators may reach different conclusions on those points. I do not present these findings as a formal conformance determination.

I also reviewed other documents in the packet. Some of those documents contain proper heading structure. I take no position on the remaining documents in the packet. My comments address the agenda only.

The packet agenda shows that posting a PDF does not by itself resolve the problem. A PDF must be created as an accessible document. The accessibility of the document posted matters more than the format of the posting.

Screen Reader Access Does Not Establish Accessibility

A Word document that a screen reader can open is not, for that reason, an accessible document. Accessibility depends on structure. That structure includes headings, lists, and a defined reading order. The structure comes from the correct styles applied when the document is created.

This structure can be produced without a template. It requires the proper stylesheet. A template built on that stylesheet makes the result consistent and repeatable. A document created from such a template carries its structure into a PDF through the Word save as PDF function.

The Recent Extension Does Not Relieve the Obligation

The recent extension of the WCAG 2.1 compliance timeline is narrow. It addressed a specific compliance date. It did not reach or relieve the general obligation to post accessible documents. Many of the issues in the attached findings are failures under WCAG 2.0 as well as under WCAG 2.1. The extension does not affect WCAG 2.0. It does not excuse the issues that fall under WCAG 2.0.

This characterization represents my understanding of the applicable WCAG success criteria. Reasonable evaluators may reach different conclusions on individual points.

Requested Action

I request that the Committee establish a permitted interaction group to study and report on accessible templates for agendas posted to the state calendar. The study should include both Word templates and HTML templates. Many blind and vision disabled users of screen reading programs, including users of JAWS, prefer HTML documents. The templates should be developed together with Enterprise Technology Services.

The purpose extends beyond the calendar. Word templates built for this purpose can be used by state agencies generally. A document created from such a template carries heading structure into a PDF. This reduces the accessibility work required of each author.

I also request that the Committee address the posting practice. An agenda should be posted as a Word document or as a PDF. The practice of pasting agenda content from a Word document into the calendar page should end.

My immediate request is that the Committee establish the permitted interaction group so that this work can begin.

Accessibility Findings

Access Hawaii Committee meeting agenda, August 6, 2026. Calendar page posting and board packet agenda.

Scope of Review

These findings are the product of my review. They represent my understanding of the applicable WCAG success criteria. Some determinations require manual evaluation, and reasonable evaluators may reach different conclusions on those points. The review of the board packet agenda covers machine-checkable structure only. It does not resolve reading order, color contrast, or the adequacy of alternative text, each of which requires manual verification. I do not present these findings as a formal conformance determination.

State Calendar Page Posting

The agenda is posted on the calendar page as plain text. The meeting title, the “Agenda” label, and the numbered items are presented as ordinary text. They do not function as headings. A screen reader user cannot navigate the agenda by heading and cannot perceive its organization the way a sighted reader does. The structure that a sighted reader perceives from position and formatting is not available to a screen reader user.

Limit of This Review

This review is based on the content as posted and displayed. It is not a review of the underlying HTML. A review of the HTML against the applicable standards can be performed by the State’s SortSite software. That review would identify the specific coding and the success criteria involved.

Board Packet Agenda (PDF)

The agenda is pages 1 through 3 of the packet. This review addresses the agenda only. The findings below are stated against WCAG success criteria and their conformance levels.

1. **No document language set.** The document catalog has no language entry. A screen reader cannot determine the language of the agenda and may apply the wrong pronunciation rules. This fails SC 3.1.1 Language of Page, Level A.
2. **No document title.** The title metadata is empty, and the setting that would display a title rather than the file name is not enabled. A viewer announces the file name instead of a descriptive title. This fails SC 2.4.2 Page Titled, Level A.
3. **No heading structure below the title.** The document contains one heading, an H1 that carries the committee name. The nine agenda items are tagged as paragraphs, not as headings and not as a list. Without headings, the user cannot jump to a specific item and must read from the beginning in sequence to reach the item sought. This fails SC 1.3.1 Info and Relationships, Level A.