

CITY OF CORPUS CHRISTI
PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT

TO: Imelda Trevino, Chairperson, Committee for Persons with Disabilities

FROM: Jennifer Buxton, Committee Liaison

COPY: Committee for Persons with Disabilities

SUBJECT: **Staff Comments for Public Service Announcements Resolution**

DATE: May 2, 2025

City staff have reviewed the resolution in support of accessible public service announcements for community members with visual loss, hearing loss, and limited English proficiency that was approved by the Committee for Persons with Disabilities on April 2, 2025. In accordance with Council Policy 10.3.2, the following comments are provided:

- When residents register with ReverseAlert, they can choose multiple methods of receiving notifications. In addition to Primary Phone, Primary Cell, and Email, individuals with hearing or speech disabilities can choose TTY (TeleTYpe) or TDD (Telecommunications Device for the Deaf) delivery methods. This allows these individuals to send and receive text messages over telephone networks.
- Both text and voice-to-text message options are utilized when emergency notifications are sent. This ensures that individuals with vision impairment can receive and understand these notifications.
- When registering to receive ReverseAlert notifications, a drop-down box on the home screen allows the individual to select a preferred language to help navigate the registration process. However, the notification software only allows notifications to be sent in English and Spanish. All other languages must be translated via an online translation function on the receiving end.
- Media outlets such as radio, television and newspapers are stand-alone businesses that manage their own content. The City is unable to influence whether they create accessible PSAs or news broadcasts. If the resolution moves forward, a distinction between City news release and media outlet news broadcasts should be made.

- The phrase “limited English proficiency” is vague and unmeasurable. It would be difficult to adhere to this requirement since it could be interpreted in many different ways by many different people. The Americans with Disabilities Act (ADA) doesn’t address “limited English proficiency.”
- ADA does not require that all of these adaptations be included at all times. ADA requires that the City make reasonable accommodations to ensure that content is accessible to users with disabilities. As written, this resolution contradicts the ADA, since ADA defines the accommodations and adaptations that need to be made. This resolution poses the risk of very expensive mandates to implement adaptations that 1) are not in accordance with ADA, and 2) are not budgeted for.
- The Resolution language used in Section 1, 2 of the Resolution states that the City “must” include the measures, and this language should be changed to “recommended” since the Committee for Persons with Disabilities has no direct authority to mandate or manage City Departments, but can recommend measures to provide program(s) to encourage, assist and enable persons with disabilities to participate in the social and economic life of the City. Therefore, the word “must” in Sections 1 and 2 should be replaced with “are recommended to.”