ADA Title II PDF Triage Report: Village of Valders, Wisconsin

Website scanned: https://valders.wi.gov/ | Scan date: October 30, 2026 | Population: 952 (2020 Census)

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SAMPLE REPORT - produced from a real automated scan of a public website. It was not requested or commissioned by the municipality.

1. Executive summary

Under the U.S. Department of Justice ADA Title II web rule, public entities serving fewer than 50,000 people must make web content, including PDFs, conform to **WCAG 2.1 Level AA by April 26, 2028** (28 CFR 35.200(b)(2), as amended by the DOJ interim final rule published April 20, 2026, 91 FR 20902). Village of Valders, Wisconsin is in that group.

We crawled 19 web pages and found **57 unique PDFs totaling 500 pages**. **39 of 57** fail at least one basic automated check (not tagged, no extractable text, no title, no language, or images without alt text). **11 PDFs (134 pages) appear to be scanned images with no readable text**; a screen reader cannot read them at all.

Recommended first step: fix the **16 'fix first' PDFs (39 pages)**: forms, fee and rate schedules, notices, service information and current agendas that residents use now. Estimated cost to hire an outside vendor to fix them: **$233–$380**. Having a vendor fix everything not proposed for archive (385 pages) is estimated at **$2,146–$3,580**. 5 older recurring documents (115 pages) are candidates to move into a labeled archive instead (staff to confirm).

Triage bucket	PDFs	Pages	Fail basic checks	Est. vendor cost to fix (low-high)
Fix first	16	39	13	$233–$380
Needs staff review	26	284	26	$1,664–$2,734
Fix going forward	10	62	0	$248–$465
Likely archive (staff to confirm)	5	115	0	$460–$862
Total (unique, entity-hosted PDFs)	**57**	**500**	**39**	**$2,606–$4,442**

Costs are estimated vendor fees to fix the files, based on published per-page rates (section 7). They are not fines or penalties, and they are estimates, not quotes. The archive row shows the cost if staff decide those files must stay live.

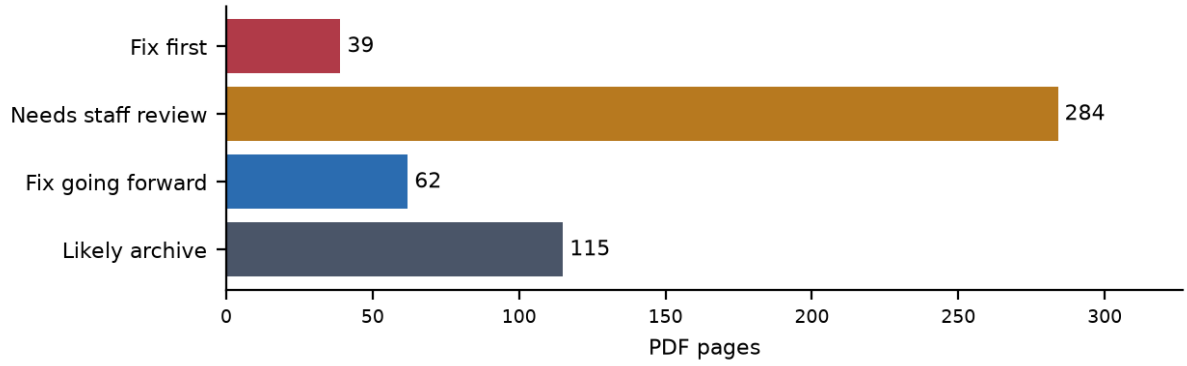


Figure 1. PDF pages by triage bucket (same numbers as the table above).

2. What the scan found

Automated check result	PDFs affected	Why it matters
No document title	36	Screen readers announce the file name instead of a meaningful title (WCAG 2.4.2).
Fonts not embedded	15	Text can render or extract incorrectly; usually fixed by re-exporting.
Not tagged (no structure tree)	14	No headings, lists, tables or reading order for assistive technology.
No document language	13	Screen readers may pronounce text in the wrong language (WCAG 3.1.1).
No extractable text (likely scanned image, needs OCR)	11	Screen readers read nothing; text can't be searched, enlarged or reflowed.
Tagged images missing alt text	6	Images such as maps, logos or diagrams have no text description (WCAG 1.1.1).
Title not set to display	1	A title exists but viewers show the file name.

14 PDFs are completely untagged; 18 pass the basic checks. Passing automated checks does **not** mean a document conforms to WCAG 2.1 AA: reading order, alt-text quality, table headers and color contrast still need human review.

PDF/UA-1 check (veraPDF): 0 of 57 PDFs pass the full PDF/UA-1 (ISO 14289-1) machine-checkable rule set. Most common top failures: 5-1: The PDF/UA version and conformance level of a file shall be specified (31 PDFs); 7.1-3: Content shall be marked as Artifact or tagged as real content (25 PDFs); 7.1-8: The Catalog dictionary of a conforming file shall contain the Metadata (16 PDFs). PDF/UA is a stricter technical standard than the rule requires; it is used here as a detailed diagnostic, not as the legal test.

3. Fix first (16 PDFs, 39 pages)

Documents residents use now to pay for, apply for, or use services, or to take part in meetings. The rule's exception for older documents does not cover documents "currently used to apply for, gain access to, or participate in" the entity's services, programs, or activities (28 CFR 35.201(b)), so fix or replace these first.

Document (link text / file)	Type	Pages	Date*	Automated issues	Est. cost
Valders Water Service Lateral Material Identification List utilities-ServiceMaterialsList.pdf	Service information (garbage/recycling/ utility)	9	2025-12-18	No extractable text (likely scanned image, needs OCR); Not tagged (no structure tree); No document title; No document language	$68–$104
2025 Consumer Confidence Report (CCR) CCR.pdf	Service information (garbage/recycling/ utility)	6	2025-12-31	None found by automated checks (manual review still needed)	$24–$45
Quick Tips for Food Licensing in Wisconsin QuickTips.pdf	Policy / requirements / guidance	4	2026-03-26	Not tagged (no structure tree); Title not set to display; No document language	$16–$30
Valders Recycling Program RECYCLE INFORMATION.pdf	Service information (garbage/recycling/ utility)	3	2025-09-18	No extractable text (likely scanned image, needs OCR); Not tagged (no structure tree); No document title; No document language	$22–$34
Information RECYCLING BROCHURE.pdf	Service information (garbage/recycling/ utility)	3	2021-08-24	No extractable text (likely scanned image, needs OCR); Not tagged (no structure tree); No document title; No document language	$22–$34
Food Licensing in Wisconsin FoodLicensingHandout.pdf	Form / application / contract	3	2021-06-03	4 of 7 tagged images lack alt text	$22–$34

Document (link text / file)	Type	Pages	Date*	Automated issues	Est. cost
Fee Schedule fees.pdf	Fee / rate schedule	2	2026-06-23	No document title	$8–$15
COMPLETE THIS FORM TO ENROLL Direct Payment Form - Utility.pdf	Form / application / contract	1	2022-05-10	5 font(s) not embedded	$4–$8
Agenda for Upcoming Village Board Meeting OCT MEETING AGENDA.pdf	Agenda	1	2026-10-09	None found by automated checks (manual review still needed)	$4–$8
GFL Environmental Services-Garbage Pickup Village of Valders Service Announcment.pdf	Public notice / service announcement	1	2025-09-18	No document title; 1 of 6 tagged images lack alt text	$8–$12
Proper Garbage Cart Placement PROPER CART PLACEMENT.pdf	Service information (garbage/recycling/ utility)	1	2025-09-24	No document title; 6 of 13 tagged images lack alt text	$8–$12
See current water and sewer rates utilityRates.pdf	Fee / rate schedule	1	2024-10-29	No document title; 1 of 1 tagged images lack alt text; 2 font(s) not embedded	$8–$12
Farmers Market Vendor & Food Truck Policies Policies.pdf	Policy / requirements / guidance	1	2026-03-23	No document title; 1 of 1 tagged images lack alt text	$8–$12
Vendor & Food Truck Contract and Acceptance Statement Contract.pdf	Form / application / contract	1	2026-03-23	No document title	$4–$8
Vendor & Food Truck Safety Requirements SafetyRequirments.pdf	Policy / requirements / guidance	1	2026-03-23	No document title	$4–$8
Seller's Permit Guide SellersPermitGuide.pdf	Policy / requirements / guidance	1	2022-11-08	Not tagged (no structure tree)	$4–$8

*Date comes from the link text, URL or listing where present, otherwise the PDF's internal creation date; the inventory records the source of each date.

4. Needs staff review (26 PDFs, 284 pages)

Municipal code and policy documents: **22 PDFs, 279 pages**, of which 8 (119 pages) are scanned images. Software cannot tell how heavily these are used, so staff should decide. Options: remediate the PDFs, or publish the code as accessible web pages, which also covers future amendments. Estimated cost to remediate as-is: $1,644–$2,696.

Document (link text / file)	Type	Pages	Date*	Automated issues	Est. cost
Chapter 18 - Land Division CHAPTER-18.pdf	Ordinance / municipal code	33	2019-04-17	No document title; 4 font(s) not embedded	$132–$248
Chapter 17 - Zoning Code CHAPTER-17.pdf	Ordinance / municipal code	32	2019-04-17	No document title; 2 of 2 tagged images lack alt text; 3 font(s) not embedded	$240–$368
Chapter 13 - Municipal Utilities CODE-CHAPTER 13.pdf	Ordinance / municipal code	27	2026-08-19	No extractable text (likely scanned image, needs OCR); Not tagged (no structure tree); No document title; No document language	$202–$310
Chapter 12 - Licenses and Permits CHAPTER-12.pdf	Ordinance / municipal code	24	2021-05-19	No extractable text (likely scanned image, needs OCR); Not tagged (no structure tree); No document title; No document language	$180–$276

Document (link text / file)	Type	Pages	Date*	Automated issues	Est. cost
Chapter 7 - Traffic Code CHAPTER-7.pdf	Ordinance / municipal code	19	2020-04-28	No extractable text (likely scanned image, needs OCR); Not tagged (no structure tree); No document title; No document language	$142–$218
Chapter 9 - Public Peace and Good Order CHAPTER-9.pdf	Ordinance / municipal code	16	2019-04-17	No document title; 4 font(s) not embedded	$64–$120
Chapter 14 - Building Code CODE CHAPTER 14.pdf	Ordinance / municipal code	16	2025-09-12	No extractable text (likely scanned image, needs OCR); Not tagged (no structure tree); No document title; No document language	$120–$184
Chapter 22 - Cable Television CHAPTER-22.pdf	Ordinance / municipal code	13	2019-04-17	No document title; 3 font(s) not embedded	$52–$98
Chapter 3 - Finance and Taxation CHAPTER 3.pdf	Ordinance / municipal code	11	2025-09-30	No extractable text (likely scanned image, needs OCR); Not tagged (no structure tree); No document title; No document language	$82–$126
Chapter 10 - Public Nuisances CHAPTER-10.pdf	Ordinance / municipal code	11	2019-04-17	No document title; 3 font(s) not embedded	$44–$82
Chapter 1 - General Government CHAPTER-1.pdf	Ordinance / municipal code	10	2019-04-17	No document title; 3 font(s) not embedded	$40–$75
Chapter 8 - Public Works CHAPTER-8.pdf	Ordinance / municipal code	10	2019-04-17	No document title; 3 font(s) not embedded	$40–$75
Table of Contents CODE-TABLE OF CONTENTS.pdf	Ordinance / municipal code	9	2025-09-12	No document title	$36–$68
Chapter 11 - Public Health and Welfare CODE CHAPTER 11.pdf	Ordinance / municipal code	9	2025-09-18	No extractable text (likely scanned image, needs OCR); Not tagged (no structure tree); No document title; No document language	$68–$104
Chapter 5 - Fire Protection CHAPTER5.pdf	Ordinance / municipal code	7	2024-04-24	No extractable text (likely scanned image, needs OCR); Not tagged (no structure tree); No document title; No document language	$52–$80

Showing the 15 largest of 26; the full list is in the inventory spreadsheet.

5. Likely archive, staff to confirm (5 PDFs, 115 pages)

Rule used: agendas, minutes, newsletters and budgets dated before October 29, 2024 (older than 24 months at scan time). The rule exempts "archived web content" (28 CFR 35.201(a)), which 28 CFR 35.104 defines as web content that:

> "(1) Was created before the date the public entity is required to comply with subpart H of this part, reproduces paper documents created before the date the public entity is required to comply with subpart H of this part, or reproduces the contents of other media created before the date the public entity is required to comply with subpart H of this part; (2) Is retained exclusively for reference, research, or recordkeeping; (3) Is not altered or updated after the date of archiving; and (4) Is organized and stored in a dedicated area or areas clearly identified as being archived."

Document (link text / file)	Type	Pages	Date*	Automated issues
2023 Meeting Minutes 2023.pdf	Minutes	26	2023-12-31	None found by automated checks (manual review still needed)
2022 Meeting Minutes 2022.pdf	Minutes	23	2022-12-31	None found by automated checks (manual review still needed)

Document (link text / file)	Type	Pages	Date*	Automated issues
2019 Meeting Minutes 2019.pdf	Minutes	23	2019-12-31	None found by automated checks (manual review still needed)
2021 Meeting Minutes 2021.pdf	Minutes	22	2021-12-31	None found by automated checks (manual review still needed)
2020 Meeting Minutes 2020.pdf	Minutes	21	2020-12-31	None found by automated checks (manual review still needed)

All four conditions must hold. Files listed next to current documents usually fail condition (4) until they are moved to a page clearly labeled as an archive (for example, "Archived Meeting Minutes (reference only)") and left unedited. Separately, 35.201(b) exempts PDFs posted before the compliance date unless they are currently used to apply for, gain access to, or participate in services. Staff and counsel should decide which exception, if any, applies.

6. Fix going forward (10 PDFs, 62 pages now online)

Recurring documents (minutes, agendas, packets, budgets, newsletters, annual reports) keep arriving. Producing them accessibly from the start costs far less than paying per page later.

- Write documents in Word or Google Docs with real Heading styles, built-in lists, and simple tables with a header row. Don't scan printed pages.
- Set File > Properties > Title and the document language. Add alt text to every image, map, logo or chart (or mark it decorative).
- Export with Save As > PDF with 'Document structure tags for accessibility' on. Don't use 'Print to PDF'; it drops tags.
- For forms, offer an accessible fillable PDF or a web form, with a label for every field and a logical tab order.
- Run a free checker before posting (Acrobat's Accessibility Checker, or veraPDF or PAC), then spot-check with a screen reader.
- If something can only be a scan (signed or historic records), OCR and tag it, or post an accessible text version beside it.
- Keep old items on a clearly labeled archive page and don't edit them after archiving.

7. Cost estimate method

What these numbers are: the estimated fee an outside remediation vendor would charge to make each PDF accessible. They are **not fines or penalties**. The ADA Title II rule does not set a fine schedule; the enforcement risk is a DOJ complaint or investigation or a private lawsuit, which this report does not try to price. Fixing files in-house would cost less in cash but take staff time.

Each PDF's page count times a per-page rate range. PDFs that are scanned, contain fillable form fields, or have tagged images missing alt text use the **advanced** rate ($7.50-$11.50/page); all others use the **simple** rate ($4.00-$7.50/page), both from Accessible.org's published pricing. Cross-checks: a California community services district's ADA memo cites about $7/page as an average market rate, and a compilation of six vendors' published prices found human remediation from $4 to $18/page; at that wider range the 39 fix-first pages would cost $156–$702. Duplicates and off-site PDFs are excluded. Staff time, re-authoring from source files (often cheaper), and converting documents to web pages are not included.

- Accessible.org - PDF Remediation pricing: https://accessible.org/services/pdf-remediation/
- Crockett Community Services District - ADA Accessibility Memo (~$7/page average): https://www.town.crockett.ca.us/files/14c76b787/7c+ADA+Accessibility+Memo.pdf
- Harbor Accessibility - PDF remediation cost per page (6-vendor compilation): https://harboraccessibility.com/blog/pdf-remediation-cost-per-page/
- Harvard University IT - Document remediation vendors: https://accessibility.huit.harvard.edu/doc-vendors

8. Method and limitations

How: an automated crawler started at https://valders.wi.gov/, obeyed robots.txt (including any Crawl-delay; none set), waited at least 1.5 seconds between requests to each host, and followed links on the entity's own site. It crawled 19 pages (nothing left in the queue). Each linked PDF (57 links) was downloaded and checked with open-source tools (pikepdf, Poppler, veraPDF): page count, size, tagging, title, language, extractable text per page (under 25 characters per page means likely scanned), tagged images without alt text, form fields, unembedded fonts, dates, and the full PDF/UA-1 rule set. Total scan time: 2 min 6 s. Triage buckets were assigned by rules using each document's type and date.

Limitations: This is a first-pass inventory, **not a WCAG 2.1 AA conformance audit**. Automated checks can't judge reading order, whether tags are correct, alt-text quality, table structure, color contrast or link text; a tagged PDF can still fail. Only PDFs linked from pages the crawler could reach were found. Files behind scripts or search forms, Word and Excel files, and the web pages themselves were not evaluated. Document type and date are inferred automatically and can be wrong, so staff should confirm every bucket assignment.

9. Disclaimer

This report is for planning purposes only and is **not legal advice**. Whether a document qualifies for an exception under 28 CFR 35.201, and what the entity must do to comply, are questions for its attorney. Regulatory citations reflect the eCFR and Federal Register as checked on October 30, 2026; DOJ has said it may propose further changes. Cost figures are estimates from published vendor rates, not quotes.

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