



CITY OF BALTIMORE
MAYOR BRANDON M. SCOTT

TO	The Honorable President and Members of the Baltimore City Council
FROM	Bob Cename, Deputy Finance Director <i>BaltAC</i>
DATE	April 7 th , 2026
SUBJECT	City Council Bill 25-0126 Accessibility in City Programs, Services, and Activities

The Honorable President and
Members of the City Council
City Hall, Room 400

Position: Does Not Oppose

The Department of Finance is herein reporting on City Council Bill 25-0126, Accessibility in City Programs, Services, and Activities, the purpose of which is implementing subtitle A of title II of the Americans with Disabilities Act of 1990, as amended, and 28 CFR Part 35 {“Nondiscrimination on the Basis of Disability in State and Local Government Services”}; establishing the mandate that no qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a City agency, or be subjected to discrimination by a City agency; defining certain terms; establishing a special effective date; and generally relating to the provision of public services to qualified individuals with a disability.

Background

This legislation codifies existing federal requirements from the Americans with Disabilities Act (ADA) into Baltimore City law and establishes standardized administrative processes for compliance across City agencies. While the bill does not create new substantive rights beyond those already required under federal law, it imposes new administrative obligations at the agency level. These obligations include the designation and compensation of ADA Coordinators; development, publication, and biennial updating of agency accessibility plans; implementation of standardized grievance procedures; collection and reporting of accommodation data; and coordination with the Office of Equity and Civil Rights (OECR).

Area	Current Practice (Before Bill)	New Obligation Under CB 25-0126
Designation of ADA staff	All agencies are required to designate an ADA Coordinator.	Each agency must designate and compensate at least one formal ADA Coordinator with defined duties.
Accessibility planning	Accessibility efforts are often ad hoc or embedded in broader equity or customer service policies.	Every agency must develop, implement, publish, and submit a formal Accessibility Plan in consultation with OECR.
Plan update cycle	No standardized Citywide schedule for reviewing accessibility practices.	Accessibility Plans must be reviewed and updated biennially

Accommodation requests	No uniform process	Agencies must formally receive, respond to, and track accommodation requests through the ADA Coordinator.
Complaint / grievance process	Individuals may complain under federal law, but City-specific procedures are inconsistent.	OECR must establish a standardized Citywide grievance procedure
Reporting requirements	No uniform reporting	Agencies must submit biennial reports
Central oversight	No single City office provides consistent technical assistance.	OECR is assigned formal oversight, coordination, and technical assistance responsibilities.

Fiscal Impact

The Department of Finance anticipates a fiscal impact of at least \$318,500 from this legislation based on anticipated staffing needs within OECR, but this estimate is not inclusive of possible costs for implementing accessibility plans and personnel costs beyond the current budget.

Fiscal Analysis

OECR will experience an increased workload related to oversight, coordination, and technical assistance responsibilities. At its present staffing levels OECR does not have the capacity to implement City Council Bill 25-0126 in the way it is intended. OECR is planning to implement this legislation in a similar manner as 18-0223 Equity Assessment Program. This legislation was created to ensure that citywide policies, programs, and budget are fair, and meet the needs of Baltimore City’s diverse communities. Presently, the Equity Office works with employees designated as the Equity Officer within each agency. The Equity Officer acts as a liaison between the Office of Equity and the agency leadership in developing their equity plans. Similarly, the ADA Coordinator in each agency will work with agency leadership and the Office of Equity to develop and implement their compliance plans.

The Operations Officer IIs would coordinate the City-wide implementation of City Council Bill 25-0126 by working with agency level ADA Coordinators. The three new Operations Officers will work to implement this legislation in the following ways. The first will be the lead ADA Coordinator for the City and will ensure that agency ADA Coordinators have the support they need to create compliance plans. The second Operations Officer will work on compliance and ensure that the plans developed by each agency are implemented. The final Operations Officer will work with the Commission on Disabilities to work on complaint intake and resolution. OECR has stated that they will not be able to implement this legislation without the augmented staffing levels.

Under this legislation, agencies must designate an employee as an ADA coordinator. Many agencies have already designated an ADA Coordinator that responds to requests for accommodations for issues pertaining to their agency. This legislation expands that role and requires Coordinators to oversee the development, publication, and biennial updating of agency accessibility plans, implementation of standardized grievance procedures, and collection and reporting of accommodation data. Compensation for ADA Coordinators cannot be reliably estimated at this time. Funding for these costs will have to be requested through the annual budget process.

To ensure City government is accessible, it is essential to focus on the places where the public interacts with the City most frequently. Two major touchpoints between the public and the City government is the City website and CharmTV. BCIT has informed the Department of Finance that the website is in compliance with the ADA. The Fiscal 2026 budget includes \$30,000 to fund closed captioning services for programming aired by CharmTV. In addition, the City also has contracts for sign language interpreter and translation services that can be used by agencies to ensure accessibility, though the costs must be covered

within agencies' current budgets. There may be additional costs for implementation of this legislation, which cannot be reliably estimated at this time. Funding for these costs will have to be requested through the annual budget process.

Conclusion

City Council Bill 25-0126 formalizes and standardizes Baltimore City's compliance with the Americans with Disabilities Act by embedding existing federal requirements into local law and establishing clear administrative structures across agencies. While the bill does not expand substantive legal obligations, it creates consistent expectations for accessibility planning, reporting, and coordination that will improve accountability and service delivery for residents with disabilities.

Implementation will result in modest but necessary fiscal impacts, primarily driven by increased staffing needs within the Office of Equity and Civil Rights to support citywide oversight and technical assistance. Although some major public-facing platforms are already compliant, the bill ensures that accessibility is addressed systematically across all agencies rather than through inconsistent or ad hoc practices. Any additional costs related to implementation will have to be requested through the annual budget process.

For the reasons stated above, the Department of Finance does not oppose City Council Bill 25-0126.

cc: Michael Mocksten
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