



1 meetings and facilitating the use of teleconferencing for public meetings during the state of  
2 emergency, and said Executive Order expired on September 30, 2021; and

3           **WHEREAS**, on September 16, 2021, Governor Newsom signed into law  
4 Assembly Bill (AB) 361, which amended the Brown Act provisions governing the use of  
5 teleconferencing for public meetings, allowing flexible teleconferencing requirements to  
6 continue during proclaimed states of emergency where certain requirements were met; and  
7

8           **WHEREAS**, Governor Newsom lifted the COVID-19 state of emergency on  
9 February 28, 2023, and, although AB 361 expired on January 1, 2024, AB 557, signed into  
10 law by Governor Newsom on October 8, 2023, maintained most of AB 361's provisions  
11 regarding teleconferencing from a non-public location during a proclaimed state of  
12 emergency, with some revisions, and eliminated any sunset date for said provisions; and

13           **WHEREAS**, on September 13, 2022, Governor Newsom signed into law AB  
14 2449, which went into effect on January 1, 2023, and allowed for members of legislative  
15 bodies to teleconference from a non-public location under the Brown Act for public meetings  
16 where "just cause" or "emergency circumstances" existed and certain requirements were  
17 followed; and  
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19           **WHEREAS**, AB 557 maintained AB 2449's sunset date of January 1, 2026, for  
20 the teleconference option for "just cause" or "emergency circumstances"; and  
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22           **WHEREAS**, on September 22, 2024, Governor Newsom signed into law AB  
23 2302, which revised the AB 2449 limits regarding the number of times members of legislative  
24 bodies were able to teleconference for "just cause" or "emergency circumstances"; and

25           **WHEREAS**, on July 24, 2024, the California Attorney General issued Opinion  
26 No. 23-1002, confirming that the Americans with Disabilities Act (ADA) generally requires  
27 legislative bodies to allow teleconference attendance from a non-public location as a  
28

1 reasonable accommodation for a member with a qualifying disability that precludes their in-  
2 person attendance at meetings subject to the Brown Act; and

3           **WHEREAS**, on January 13, 2025, the City Council adopted Resolution No.  
4 2025-R002, which adopted City Council Policy Statement No. 3006 (with a clerical error  
5 labeling it as No. 3004) regarding the following public meeting teleconference attendance  
6 options available to members of legislative bodies: “traditional” teleconferencing for  
7 members of the City Council and Planning Commission; teleconferencing for Just Cause or  
8 Emergency Circumstances for members of the City Council and Planning Commission;  
9 teleconferencing during a proclaimed State of Emergency for members of all City of Culver  
10 City legislative bodies; and teleconferencing as a Reasonable Accommodation under the  
11 ADA for members of all City of Culver City legislative bodies; and

12           **WHEREAS**, on October 3, 2025, Governor Newsom signed into law Senate Bill  
13 707 (2025, Durazo) (“SB 707”), which imposes new procedural, technological, and public  
14 access obligations intended to expand participation in local government meetings, including  
15 requirements related to public participation, teleconferencing, translation accessibility,  
16 disruption procedures, and public outreach procedures, modernizing Brown Act; and

17           **WHEREAS**, certain SB 707 provisions went into effect on January 1, 2026, with  
18 key SB 707 changes becoming effective on July 1, 2026; and

19           **WHEREAS**, SB 707 includes substantive changes to teleconference  
20 attendance options, including but not limited to adding categories to and extending the sunset  
21 date for “just cause” until January 1, 2030, adding “Local Emergency” to the State of  
22 Emergency teleconferencing option, and codifying the “reasonable accommodation”  
23 teleconference option, among other changes related to teleconference attendance for  
24 members of legislative bodies; and

1           **WHEREAS**, additionally, on July 1, 2026, “eligible legislative bodies”, such as  
2 the City Council of Culver City, will also be subject to new requirements relating to the  
3 conduct of Brown Act meetings, including but not limited to allowing the public to participate  
4 in meetings of the City Council through either a two-way telephonic service or a two-way  
5 audiovisual platform, and adopting (not on consent calendar) a disruption policy which will  
6 govern the City’s actions when the aforementioned two-way telephonic or audiovisual service  
7 is disrupted, including procedures for restoring service, responding to disruptions that prevent  
8 public participation, and reconvening a meeting; and  
9

10           **WHEREAS**, pursuant to SB 707, the City Council now desires to (1) adopt an  
11 amended City Council Policy Statement No. 3006 regarding public meeting teleconference  
12 attendance options and guidelines for members of legislative bodies, including “traditional”  
13 teleconferencing (available only to members of the City Council and Planning Commission),  
14 teleconferencing for Just Cause (available only to members of the City Council and Planning  
15 Commission), teleconferencing during a proclaimed State of Emergency or Local Emergency  
16 (available to members of all City of Culver City legislative bodies), and teleconferencing as a  
17 Reasonable Accommodation under the ADA (available to members of all City of Culver City  
18 legislative bodies); (2) adopt Council Policy Statement No. 3007 regarding a Brown Act  
19 Meeting Disruption Policy applicable to the City Council; and (3) rescind Resolution No. 2025-  
20 R002 regarding the outdated City Council Policy Statement No. 3006; and  
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23           **WHEREAS**, the City Council further desires to reserve the right to update these  
24 policies from time to time as desired or as required by future legislation;

25           **NOW, THEREFORE**, the City Council of the City of Culver City, **DOES**  
26 **HEREBY RESOLVE** as follows:  
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# Exhibit A

## CITY OF CULVER CITY COUNCIL POLICY STATEMENT

Policy Number: 3006

General Subject: City Council and Commissions

Date Issued: 06/08/2026

Specific Subject: Public Meeting Teleconference  
Attendance Options and Guidelines  
for Members of Legislative Bodies

Effective Date: 06/08/2026

Resolution No: 2026-RXX

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### I. PURPOSE:

The purpose of this Policy is to provide guidelines to and requirements for members of legislative bodies (Members) and City Staff regarding the following teleconference options available to Members for attendance at public meetings subject to the Ralph M. Brown Act (Brown Act):

- A. “**Traditional**” teleconferencing from public locations;
- B. Teleconferencing from non-public locations for **Just Cause**;
- C. Teleconferencing from non-public locations during a proclaimed **State of Emergency or Local Emergency**; and
- D. Teleconferencing from non-public locations as a **Reasonable Accommodation** under the Americans with Disabilities Act (ADA).

### II. SCOPE:

**Section IV** of this Policy provides guidelines and requirements regarding teleconference attendance from public locations pursuant to the “**Traditional**” **Teleconference** rules under the Brown Act, specifically Government Code Section 54953(b), an option only available to Members of the City Council and the Planning Commission.

**Section V** of this Policy provides guidelines and requirements regarding teleconference attendance from non-public locations for **Just Cause**, an option only available to Members of the City Council and the Planning Commission. Section V of this Policy will expire and have no further effect for meetings on and after January 1, 2030, unless such sunset date in Government Code Section 54953.8.6(c) is extended by the California Legislature.

**Section VI** of this Policy provides guidelines and requirements regarding teleconference attendance from non-public locations during a proclaimed **State of Emergency** or **Local Emergency** pursuant to Government Code Section 54953.8.2, an option available to Members of all City of Culver City Legislative Bodies.

Lastly, **Section VII** of this Policy provides guidelines and requirements regarding teleconference attendance from non-public locations as a **Reasonable Accommodation pursuant to the ADA**, per Government Code Section 54953(c), an option available to Members of all City of Culver City Legislative Bodies.

This Policy may be updated from time to time to include other legislative bodies, where currently not included, or for other amendments, with further action of the City Council. The City Council may authorize additional teleconference opportunities afforded by the State in the future.

### **III. BACKGROUND:**

The Brown Act requires that, except as specifically provided, “meetings of the legislative body of a local agency shall be open and public, and all persons shall be permitted to attend any meeting of the legislative body[.]” (Gov. Code § 54953(a).) A legislative body may use “traditional” teleconferencing provided (i) at least a quorum of the legislative body participates in the meeting from locations within the agency’s boundaries; (ii) the agency gives notice of each teleconference location and posts an agenda at each teleconference location; (iii) public access is provided at each teleconference location; and (iv) members of the public are allowed to address the Council or the City’s other boards and commissions at each teleconference location. (Gov. Code § 54953(b)(3).)

On March 18, 2020, as a result of a statewide state of emergency declared on March 4, 2020, due to the COVID-19 pandemic, Governor Gavin Newsom issued Executive Order No. N-29-20 suspending the Brown Act’s requirements for in-person meetings and facilitating the use of teleconferencing for public meetings during the state of emergency. The Executive Order expired on September 30, 2021.

On September 16, 2021, Governor Newsom signed into law Assembly Bill (AB) 361. AB 361 amended the Brown Act provisions governing the use of teleconferencing for public meetings, allowing more flexible teleconferencing requirements to continue during proclaimed states of emergency where certain requirements were met. Governor Newsom lifted the COVID-19 state of emergency on February 28, 2023. Although AB 361 expired on January 1, 2024, AB 557, signed into law by Governor Newsom on October 8, 2023, maintained most of the AB 361 provisions with some revisions, and eliminated any sunset date for said provisions.

On September 13, 2022, Governor Newsom signed into law AB 2449, which went into effect on January 1, 2023. AB 2449 allowed for Members to teleconference under the Brown Act for public meetings where Just Cause or Emergency Circumstances existed and certain requirements were followed. AB 557 maintained AB 2449’s sunset date of January 1, 2026, for such teleconferencing alternatives.

On July 24, 2024, the California Attorney General issued Opinion No. 23-1002, confirming that the ADA generally requires legislative bodies to allow teleconference attendance from a non-public location as a reasonable accommodation for a Member with a qualifying disability that precludes their in-person attendance at meetings subject to the Brown Act.

On October 3, 2025, Governor Newsom signed SB 707 into law. The intent of this bill is to increase public engagement in local government and modernize the Brown Act. Various SB 707 provisions went into effect on January 1, 2026, and others on July 1, 2026. SB 707 includes key changes to teleconference attendance options, including but not limited to expanding and extending the sunset date for “just cause” teleconferencing through December 31, 2029, adding “Local Emergency” to the State of Emergency teleconferencing option, and codifying the “reasonable accommodation” teleconference right, among other changes related to teleconference attendance for Members.

#### **IV. TRADITIONAL TELECONFERENCE ATTENDANCE UNDER THE BROWN ACT:**

##### **A. Traditional Teleconference Requirements.**

The Brown Act authorizes legislative bodies to utilize teleconferencing, where Members “are in different locations, connected by electronic means, through either audio or video, or both,” for public meetings. (Cal. Gov. Code § 54953(b), (j)(6).) Teleconferencing “may be used for all purposes in connection with any meeting within the subject matter jurisdiction of the legislative body.” (Cal. Gov. Code § 54953(b)(2).) If any Member uses such “traditional” teleconferencing, the legislative body must comply with the following requirements:

- 1) All votes taken must be by rollcall;
- 2) The teleconference meeting shall be conducted in a manner that protects the statutory and constitutional rights of the parties or the public appearing before the legislative body;
- 3) The legislative body must give notice of the meeting and post agendas as otherwise required;
- 4) The legislative body must allow members of the public to access the meeting and the agenda shall provide an opportunity for members of the public to address the legislative body directly;
- 5) Agendas shall be posted at each teleconference location, which shall be identified in the notice and agenda;

- 6) Each teleconference location must be accessible to the public; **and**
- 7) At least a quorum of Members must participate from locations within the jurisdictional boundaries of the local agency.

**B. Requests and Process for Traditional Teleconference Attendance.**

- 1) A Member submits an email request to attend by traditional teleconference to the Commission Secretary, who shall forward the request to the City Clerk for approval, or to the City Clerk for approval in the case of a Council meeting, as soon as possible prior to a Commission or Council meeting, but no later than one week prior to the date of the public meeting.
- 2) A Member's email request must include pertinent information, including but not limited to:
  - a. Date of the meeting the Member seeks to attend via teleconference; and
  - b. The location from which the Member seeks to teleconference, and confirmation that such location will be reasonably accessible to the public, such that any member of the public could participate in the teleconference from the location if they wished to do so.
- 3) When at least a quorum of the Council or Commission will participate from locations within the jurisdictional boundaries, all requests to attend a meeting via teleconference from a non-public location shall be allowed if they otherwise comply with this Policy.
- 4) In all cases, the City Clerk shall review teleconference requests for compliance with this Policy. They shall then submit all requests to the Mayor or Commission Chair and include information regarding compliance of each request with this Policy and which requests are granted.
- 5) Prior to roll call, the Mayor or Commission Chair shall publicly disclose, at the beginning of the meeting, that the meeting is being conducted pursuant to Government Code Section 54953(b), in that a Member(s) is participating by audio or video technology. The Mayor or Commission Chair shall confirm that, in accordance with the Brown Act, the teleconference location has been identified in the notice and agenda for the meeting.
- 6) The City Clerk or Commission Secretary may confirm with the Member(s) participating via teleconference that they can hear them well, they have been able to hear the proceedings up until that point, they have a copy of the agenda, they have posted the agenda at the teleconference location,

their location is reasonably accessible to the public, whether there is any member of the public there with them who would like to participate in the public comment portion or otherwise address any agenda item for the meeting, and any other questions the Clerk or Secretary deem necessary.

- 7) Any Member using traditional teleconferencing may appear via audio or video technology, and the agendized teleconference location must remain accessible to the public throughout the entire duration of the meeting.

## **V. TELECONFERENCE ATTENDANCE FOR “JUST CAUSE”:**

### **A. Definitions.**

- 1) ***Just Cause*** means any of the following:

- a. A childcare or caregiving need of a child, parent, grandparent, grandchild, sibling, spouse, or domestic partner that requires them to participate remotely. “Child,” “parent,” “grandparent,” “grandchild,” “sibling,” and “domestic partner” mean:

1. “Child” - a biological, adopted, or foster child, a stepchild, a legal ward, a child of a domestic violence partner, or a person to whom the Member stands in place of a parent.
2. “Parent” – a biological, foster, or adoptive parent, a parent-in-law, a stepparent, a legal guardian, or other person who stood in place of a parent to the Member when the Member was a child.
3. “Grandparent” - a parent of the Member’s Parent.
4. “Grandchild” - a child of the Member’s Child.
5. “Sibling” - a person related to the Member by blood, adoption, or affinity through a common legal or biological Parent.
6. “Domestic Partner” - when a Member and another adult have chosen to share one another’s lives in an intimate and committed relationship of mutual caring and who have filed a Declaration of Domestic Partnership with the California Secretary of State, and have established a domestic partnership pursuant to Family Code Section 297.

- b. A contagious illness that prevents a Member from attending in person.

- c. A need related to a physical or mental condition that is not subject to Section VII of this Policy.
- d. Travel while on official business of the City or another state or local agency.
- e. An immunocompromised child, parent, grandparent, grandchild, sibling, spouse, or domestic partner of the Member that requires the Member to participate remotely.
- f. A physical or family medical emergency that prevents the Member from attending in person.
- g. Military service obligations that result in the Member being unable to attend in person because they are serving under official written orders for active duty, drill, annual training, or any other duty required as a member of the California National Guard or a United States Military Reserve organization that requires the member to be at least 50 miles outside the boundaries of the City.

#### **B. Requests for Just Cause Teleconference Attendance.**

Subject to the other applicable requirements of this Policy, a Member of the Council or Commission shall be eligible to attend a meeting by teleconference from a non-public location if a Member submits an email request to attend by teleconference for Just Cause to the Commission Secretary, who shall forward the request to the City Clerk for approval, or to the City Clerk for approval in the case of a Council meeting, as soon as possible prior to a Commission or Council meeting, but no later than the start of the meeting. The request must include a general description (that need not include medical information exempt under law) relating to their need to appear remotely at the given meeting.

A Member must make a separate request for each meeting in which they seek to participate by teleconference for Just Cause.

#### **C. Process for Deciding and Allocating Just Cause Teleconference Requests.**

- 1) In conjunction with the Mayor (or Mayor's designee) or Commission Chair, the City Clerk or Commission Secretary shall advise the Council or Commission Member, respectively, as soon as possible upon completion of the process described in this Section as to whether their teleconference request is allowed or denied.

- 2) When at least a quorum of the Council or Commission will participate in-person, all requests to attend a meeting via teleconference from a non-public location for just cause shall be allowed if they otherwise comply with this Policy.
- 3) When a quorum of the Council or Commission request to attend a meeting via teleconference subject to quorum requirements, attendance for Members whose requests comply with this Policy shall be allowed in the case of Just Cause on a first come, first served basis based on the time the requests were first received by the City Clerk or Commission Secretary, as applicable, including the statement describing Just Cause.
- 4) In all cases, the City Clerk shall review teleconference requests for compliance with this Policy. They shall then submit all requests to the Mayor or Commission Chair and include information regarding compliance of each request with this Policy and which requests are granted or denied. The Mayor or Commission Chair shall be made aware of the allocation process, including the final decision as to which requests are granted or denied.

#### **D. Member Requirements During Just Cause Teleconference Attendance.**

If a teleconference request is granted, the Member must participate through both audio *and* on camera visual technology throughout the meeting.

The Member shall publicly disclose at the meeting before any action is taken whether any other individuals 18 years of age or older are present in the room at the remote location with the Member, and the general nature of the Member's relationship with those individuals.

#### **E. Quorum Requirements Under Just Cause Teleconference Attendance.**

A quorum of the Council or Commission must be physically present for the entire meeting at the same single physical location in the City identified on the meeting agenda and open to the public. A meeting may not continue if the in-person quorum is lost during a meeting.

#### **F. Public Access and Participation During Just Cause Teleconference Attendance.**

A meeting of the Council or a Commission at which teleconference attendance from a non-public location(s) is permitted under this Section must provide for public attendance at the noticed in-person meeting location and one of the following means for the public to remotely hear and visually observe the meeting and remotely address the Council or Commission at the meeting:

- a. A two-way audiovisual platform; or

b. A two-way telephonic service and a live webcasting of the meeting.

Any notice of the meeting or meeting agenda shall identify the in-person meeting location, as well as the means by which members of the public may access the meeting and offer public comment, including identifying and including an opportunity for all persons to attend via a call-in option or internet-based service option.

Public comments are not required to be provided in advance of the meeting and must be allowed in real time.

However, an individual wanting to provide public comment through the use of an internet website, or other online platform, not under the control of the local legislative body, that requires registration to log in to a teleconference may be required to register as required by the third-party internet website or online platform to participate.

If there is a timed public comment period for each agenda item, the body shall not close the public comment period for the agenda item, or the opportunity to register to provide public comment until that timed public comment period has elapsed. If the body does not provide a timed public comment period, but takes public comment separately on each agenda item, the body shall allow a reasonable amount of time per agenda item to allow public members the opportunity to provide public comment, including time for members of the public to register, or otherwise be recognized for the purpose of providing public comment. If a body provides a timed general public comment period that does not correspond to a specific agenda item, it shall not close the public comment period or the opportunity to register until the timed general public comment period has elapsed.

The body shall have and implement a procedure for receiving and swiftly resolving requests for reasonable accommodation for individuals with disabilities, consistent with the ADA, and resolving any doubt in favor of accessibility. In each instance in which notice of the time of the meeting is otherwise given or the agenda for the meeting is otherwise posted, the body shall also give notice of the procedure for receiving and resolving requests for accommodation. The body shall conduct meetings consistent with applicable civil rights and nondiscrimination laws.

In the event of a disruption that prevents the body from broadcasting the meeting to members of the public using the call-in option or internet-based service option, or in the event of a disruption within the local agency's control that prevents members of the public from offering public comments using the call-in option or internet-based service option, the legislative body shall take no further action on items appearing on the meeting agenda until public access to the meeting via the call-in option or internet-based service option is restored. Actions taken on agenda items during a disruption that prevents the legislative body from broadcasting the meeting may be challenged pursuant to Government Code Section 54960.1.

### **G. Limitation of Member Just Cause Teleconference Attendance.**

- 1) No more than two (2) meetings per year, if the legislative body regularly meets once per month or less;
- 2) No more than five (5) meetings per year, if the legislative body regularly meets twice per month; or
- 3) No more than seven (7) meetings per year, if the legislative body regularly meets three or more times per month.

### **H. Meeting Minutes for Just Cause Teleconference Attendance.**

Any Member who participates in a teleconference meeting from a remote location pursuant to this section and the specific provision of law and the “just cause” category that the Member relied upon to permit their participation by teleconferencing shall be listed in the minutes of the meeting. This requirement shall not be construed to require the Member to disclose any medical diagnosis or disability, or any personal medical information that is otherwise exempt under existing law.

## **VI. TELECONFERENCE ATTENDANCE DURING A PROCLAIMED STATE OF EMERGENCY OR LOCAL EMERGENCY:**

### **A. Teleconference Requirements During a State of Emergency or Local Emergency.**

Members of a legislative body may use teleconferencing *without* (1) posting agendas at each teleconference location, (2) identifying each teleconference location in the notice and agenda, (3) making each teleconference accessible to the public, (4) providing a physical location from which the public may attend or comment, and (5) requiring a quorum of Members to participate from within the jurisdictional boundaries, if this Section is adhered to and teleconferencing is used in either of the following circumstances:

- 1) The legislative body holds a meeting during a proclaimed State of Emergency or Local Emergency for the purpose of determining, by majority vote, whether as a result of the emergency, meeting in person would present imminent risks to the health or safety of attendees; *or*
- 2) After a determination in paragraph (1) is made that, as a result of the emergency, meeting in person would present imminent risks to the health or safety of attendees.

Where the State of Emergency or Local Emergency remains active, the legislative body shall, no later than 45 days after teleconferencing for the first time during the emergency, and every 45 days thereafter, make the following findings by majority vote:

- a. The legislative body has reconsidered the circumstances of the State of Emergency or Local Emergency; *and*
- b. The State of Emergency or Local Emergency continues to directly impact the ability of the Members to meet safely in person.

**State of Emergency** means a state of emergency proclaimed pursuant to Section 8625 of the California Emergency Services Act.

**Local Emergency** means a condition of extreme peril to persons or property proclaimed by the City Council, in accordance with Section 8630 of the California Emergency Services Act, as defined in Section 8680.9, or a local health emergency declared pursuant to Section 101080 of the Health and Safety Code, and only refers to local emergencies in the boundaries of the City of Culver City.

**B. Process and Procedures for State of Emergency or Local Emergency Teleconferencing.**

Assuming the requirements in Subsection A, above, are satisfied, the City Clerk or Commission Secretaries will notify Members of their ability to teleconference during the proclaimed State of Emergency or Local Emergency. In other words, Members do not need to make individual requests to teleconference under this option.

**C. Member Requirements During State of Emergency or Local Emergency Teleconferencing.**

Each Member who participates in a teleconference meeting from a remote location pursuant to this section shall publicly disclose at the meeting before any action is taken whether any other individuals 18 years of age or older are present in the room at the remote location with the Member, and the general nature of the Member's relationship with those individuals.

**D. Public Access and Participation during State of Emergency or Local Emergency Teleconferencing.**

The legislative body conducting teleconferencing during a State of Emergency or Local Emergency may elect to use (1) a two-way telephonic service *with or without* a live webcasting of the meeting, *or* (2) a two-way audiovisual platform.

The legislative body need not provide a physical location from which the public may attend or comment but must give notice of the means by which members of the public may access the meeting and offer public comment. The agenda must identify and include an opportunity for all persons to attend via a call-in option or an internet-based service option.

Any notice of the meeting or meeting agenda shall identify the means by which members of the public may access the meeting and offer public comment, including identifying and including an opportunity for all persons to attend via a call-in option or internet-based service option. Public comments are not required to be provided in advance of the meeting and must be allowed in real time. However, an individual wanting to provide public comment through the use of an internet website, or other online platform, not under the control of the local legislative body, that requires registration to log in to a teleconference may be required to register as required by the third-party internet website or online platform to participate.

If there is a timed public comment period for each agenda item, the body shall not close the public comment period for the agenda item, or the opportunity to register to provide public comment until that timed public comment period has elapsed. If the body does not provide a timed public comment period, but takes public comment separately on each agenda item, the body shall allow a reasonable amount of time per agenda item to allow public members the opportunity to provide public comment, including time for members of the public to register, or otherwise be recognized for the purpose of providing public comment. If a body provides a timed general public comment period that does not correspond to a specific agenda item, it shall not close the public comment period or the opportunity to register until the timed general public comment period has elapsed.

The body shall have and implement a procedure for receiving and swiftly resolving requests for reasonable accommodation for individuals with disabilities, consistent with the ADA, and resolving any doubt in favor of accessibility. In each instance in which notice of the time of the meeting is otherwise given or the agenda for the meeting is otherwise posted, the body shall also give notice of the procedure for receiving and resolving requests for accommodation. The body shall conduct meetings consistent with applicable civil rights and nondiscrimination laws.

In the event of a disruption that prevents the body from broadcasting the meeting to members of the public using the call-in option or internet-based service option, or in the event of a disruption within the local agency's control that prevents members of the public from offering public comments using the call-in option or internet-based service option, the legislative body shall take no further action on items appearing on the meeting agenda until public access to the meeting via the call-in option or internet-based service option is restored. Actions taken on agenda items during a disruption that prevents the legislative body from broadcasting the meeting may be challenged pursuant to Government Code Section 54960.1.

**E. Meeting Minutes for State of Emergency or Local Emergency Teleconference Attendance.**

Any Member of the legislative body who participates in a teleconference meeting from a remote location pursuant to this section and the specific provision of law that the

Member relied upon to permit their participation by teleconferencing shall be listed in the minutes of the meeting.

## **VII. TELECONFERENCE ATTENDANCE AS A REASONABLE ACCOMMODATION UNDER THE ADA.**

A person has a “disability” under the ADA if they have a physical or mental impairment that substantially limits one or more of their major life activities; a record of such an impairment; or being regarded as having such an impairment. A person with a qualifying disability may request a reasonable accommodation under various titles of the ADA.

A Member of a legislative body’s request for a reasonable accommodation for a qualifying disability may fall under Title I or Title II of the ADA, depending on the specific legislative body. Title I of the ADA applies to certain employers, such as the City. Title II of the ADA covers services, programs, or activities of state and local governments.

Under Title I, the City must provide a reasonable accommodation to an employee with a qualifying disability to perform the essential functions of their job unless it would cause the City an “undue hardship.” Under Title II, the City must provide a reasonable accommodation to a person with a qualifying disability who meets the essential eligibility requirements to participate in programs or activities provided by the City, unless it would fundamentally alter the government program or activity or would cause an administrative burden.

A Member of the Council or a Commission may participate in a public meeting by teleconference attendance from a non-public location as a reasonable accommodation under either Title I or Title II of the ADA (to be determined by the City) if that Member has a qualifying disability that prevents in-person attendance.

### **A. Requests and Process for Reasonable Accommodation Teleconference Attendance.**

- 1) Requests by Members to attend a legislative body meeting via teleconference should be made as soon as possible so appropriate arrangements can be made. Failure to provide sufficient notice for technical and related adjustments may result in a Member missing a meeting, or they may participate without an accommodation. The request may be made via email to the Commission Secretary or City Clerk, who will coordinate with City Staff, including but not limited to the Human Resources Department.
- 2) The City may contact a Member to gather additional information about their medical restrictions and need for meeting accommodations. Members should remain available to receive emails or phone calls to discuss their

accommodation request. Failure to respond to requests for required information may result in denial of a Member's request.

- 3) If a Member's accommodation request is approved, they will be informed in writing that it will be implemented on an ongoing basis until the Member has informed the City they no longer require the accommodation, should that be the case.
- 4) If a Member and/or their health care provider decide they no longer require the accommodation, they must notify the City as soon as possible to make the necessary changes. Members may be required to provide updated information about their medical restrictions before a change is considered or implemented.
- 5) The City will keep any medical information received or gathered in connection with a disability-related accommodation confidential.

**B. Legal Requirements for Reasonable Accommodation Teleconference Attendance.**

- 1) The Member shall participate through both audio and visual technology, except that any member with a disability, as defined in Section 12102 of Title 42 of the United States Code, may participate only through audio technology if a physical condition related to their disability results in a need to participate off camera; and
- 2) The Member shall disclose at the meeting before any action is taken, whether any other individuals 18 years of age or older are present in the room at the remote location with the Member, and the general nature of the Member's relationship with any of those individuals.

**C. Brown Act Teleconference Provisions Waived for Reasonable Accommodation Teleconference Attendance.**

Remote participation under this option shall be treated as in-person attendance at the physical meeting location for all purposes, including any requirement that a *quorum* of the legislative body participate from any particular location.

Traditional and non-traditional teleconference rules are *waived* except to the extent stated in this Section.

***\*This Policy supersedes Policy No. 3006 issued on January 13, 2025 by Resolution No. 2025-R002.***

# Exhibit B

## CITY OF CULVER CITY COUNCIL POLICY STATEMENT

**Policy Number: 3007**

General Subject: City Council

Date Issued: 06/08/2026

Specific Subject: Brown Act Meeting Technology  
Disruption Policy

Effective Date:06/08/2026

Resolution No: 2026-RXX

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### **I. PURPOSE:**

The purpose of this Policy is to ensure continuity of public access and participation during meetings of the City Council when the requisite two-way telephonic or two-way audiovisual remote access services or technology are disrupted, in compliance with Senate Bill (SB) 707 (2025) and Government Code Section 54953.4.

### **II. SCOPE:**

The guidelines and requirements of this Policy shall apply to meetings of the City Council.

### **III. BACKGROUND:**

SB 707 amended the Brown Act to require eligible legislative bodies, as defined under Government Code Section 54953.4(e)(2), on or before July 1, 2026, to provide for remote public participation and establish a Disruption Policy for formalized procedures in the event of service or technology disruption. The policy must address procedures for recessing and reconvening a meeting in the event of a service or technology disruption and the efforts that the eligible legislative body shall make to attempt to restore the service or technology.

### **IV. PROCEDURES IN THE EVENT OF SERVICE OR TECHNOLOGY DISRUPTION:**

#### **A. Response to Service or Technology Disruption.**

If the City Clerk becomes aware of a disruption to the agency's remote access services or technology that prevents members of the public from attending or observing the meeting remotely:

1. The Clerk shall immediately announce the disruption to the public.
2. The Mayor may then call for a recess of the open session or convene the City Council meeting in closed session, consistent with the Brown Act.
3. Staff shall begin efforts to diagnose and restore the disrupted service or technology.

4. The meeting shall remain in recess for at least one hour or until service or the technology is restored, whichever is sooner. The recess period may be extended if restoration efforts are ongoing.

### **B. Efforts to Restore Service or Technology.**

The agency shall make good faith efforts to restore remote access services or technology, which may include:

- Troubleshooting platform or teleconferencing software;
- Resetting or replacing audiovisual equipment;
- Attempting alternative connection methods;
- Contacting necessary support staff or service providers; and
- Switching to back-up equipment or platforms, if available.

The Clerk shall document the restoration efforts undertaken.

### **C. Reconvening the Open Session.**

#### ***Timing:***

Open session may be reconvened after at least one hour has elapsed from the time of disruption or as soon as service or the technology is restored, whichever occurs earlier.

#### ***If Service or Technology is Restored:***

If the remote access service or technology is restored before or at the time the meeting reconvenes, the meeting shall continue as normal.

#### ***If Service or Technology is Not Restored:***

If the service or technology has not been restored after one hour, the City Council may reconvene and:

1. Adjourn the meeting; or
2. Continue the meeting in open session by adopting, by roll call vote, the following, or substantially similar, findings:

*“The City of Culver City has made good faith efforts to restore telephonic or internet service or technology to allow members of the public to attend or observe the City Council meeting via a two-way telephonic service or two-way audiovisual platform in accordance with City Council Policy Statement No. 3007. The City has been unable to restore the telephonic or internet service or technology, and the public interest in continuing the meeting outweighs the public interest in remote public access.”*

Upon adoption of the above findings, the legislative body may continue the open session even though the remote access service or technology has not been restored.

#### **D. Recordkeeping.**

The Clerk shall enter a brief statement into the meeting minutes, including the following:

- The nature and time of the disruption;
- The restoration efforts undertaken;
- The time the meeting was reconvened (if applicable); and
- Any finding(s) adopted.

#### **E. Preparation and Mitigation.**

To minimize the likelihood of disruptions, Staff shall make reasonable efforts to:

- Verify telephonic and audiovisual systems prior to each meeting;
- Maintain backup call-in numbers or alternative platforms when feasible;
- Provide a method for the public to report access issues during the meeting; and
- Ensure captioning and interpretation services are activated when required.

#### **F. Public Notice and Website Posting.**

The City shall post clear instructions on its website explaining how to attend and comment remotely, including alternative options if a platform fails.

Meeting notices shall state that a meeting disruption policy is in effect and identify where it may be accessed.

Instructions shall be provided in applicable languages consistent with SB 707 language-access requirements.

#### **G. Review and Updates.**

This Policy may be amended by the City Council at a noticed public meeting in open session, not on the consent calendar.