JEFFERSON COUNTY PROGRESS
TO DATE REPORT
Improving Digital Accessibility

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Jefferson County Progress to Date Report

Introduction

Jefferson County (Jeffco) is committed to providing services that are accessible to the widest possible audience. Digital equity aligns with our core values and is essential to Jeffco’s vision which is “to be a county government that provides equitable, innovative, efficient, and quality service to a thriving and safe community.”

- Jeffco is committed to providing online services that are accessible to the widest possible audience, regardless of ability.
- Jeffco is dedicated to ensuring that all information and communication technology (ICT) utilized by the county complies, at a minimum, with all applicable Level A and AA success criteria of the current non-draft version of the Web Content Accessibility Guidelines (WCAG) or the version specified by the Governor’s Office of Information Technology (OIT).
- Jeffco acknowledges that achieving digital equity requires a long-term strategic approach through continuous, iterative, and evolving processes.

This resource is divided into four main sections to help you learn about:

- **Why We Are Doing This (Legal Requirements):** In alignment with our commitment to digital equity, various laws mandate that we ensure that our services, programs, and activities comply with or surpass internationally recognized accessibility standards and best practices.
- **How We Are Approaching This (Organizational Approach):** The Digital Accessibility Program spans the county. While using a centralized approach to project management, our working groups allow us to leverage the expertise within their respective areas addressing ICT.
- **What We Are Doing (ICT Accessibility Goals & Strategies):** We have three primary goals supported by a wide variety of activities. We have included milestones, barriers, and next steps for each goal.
- **Where We Are (Solutions and Statuses):** we are committed to transparency sharing our progress, plans, and anticipated time frames.
Colorado Laws

**HB21-1110**

On June 30, 2021, HB21-1110 Act was signed. This act added language to strengthen the current Colorado law for protection against discrimination against persons with disabilities. This specifically relates to accessibility of government information technology. The added provisions include:

- Prohibiting a person with a disability from being excluded from participating in or being denied the benefits of services, programs, or activities of a public entity or a state agency
- Clarifying that such prohibition includes the failure of a public entity or state agency to develop an accessibility plan and fully comply, on or before July 1, 2024, with accessibility guidelines established by the Office of Information Technology (OIT)

**SB23-244**

On April 20, 2023, SB23-244 Technology Accessibility Cleanup Bill was approved and became effective. This act:

- Clarifies statutory language to ensure the provision of reasonable accommodations for persons with disabilities
- Requires the OIT to promulgate rules regarding accessibility standards for an individual with a disability for information technology systems employed by state agencies
- Clarifies language regarding sanctions for failing to comply with accessibility standards

**8 CCR 1501-11**

In March 2024, the Governor’s OIT finalized the Rules Establishing Technology Accessibility Standards 8 CCR 1501-11. The purpose of the rules is to define the accessibility technical standards and compliance parameters for individuals with a disability for information technology systems. The rules are intended to improve the accessibility and usability of government information technology products and services in Colorado.

The rules apply to all information and communication technology (ICT), including both public-facing and internal-facing, that is procured, developed, maintained, or used by public entities and state agencies.
This ICT includes but is not limited to websites, applications, kiosks, digital signage, digital documents, video, audio, and third-party tools that are owned or controlled by the public entity.

The rules apply to the components of hardware that transmit information to a user or have a user interface.

**HB24-1454**

On May 24, 2024, the Governor signed House Bill 24-1454, which temporarily postpones the liability for public entities that do not comply with the OIT Rules Establishing Technology Accessibility Standards, if the public entities demonstrate a good faith effort toward compliance. Beginning on July 1, 2024, public entities can either comply with OIT’s rules, or they can choose to comply with the criteria in HB 24-1454 for one year through July 1, 2025, while they continue their efforts to come into compliance with the OIT rules. There are additional stipulations regarding actions public entities must take during this period.

Jeffco has chosen to comply with the criteria in HB 24-1454 for one year through July 1, 2025, while we continue our efforts to come into compliance with the OIT rules.

**Federal Laws**

**Title II of the Americans with Disabilities Act (ADA)**

Title II of the ADA requires governments ensure people with disabilities have an equal opportunity to benefit from all of their programs, services, and activities. The ADA is meant to ensure that individuals with disabilities can fully participate in all aspects of civic life. In practice, this means that governments must engage in effective communication, provide reasonable modifications and/or accommodations, facilitate access, and adhere to applicable standards.

**89 FR 31320 Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities**

In April 2024, 89 FR 31320 was published. The final rule has specific requirements about how to ensure that web content and mobile applications (apps) are accessible to people with disabilities. The requirements of 89 FR 31320 are very similar to HB21-1110 and are based on WCAG 2.1 AA standards. The deadline for compliance under 89 FR 31320 for state and local agencies is April 24, 2026.

**Section 508 of the Rehabilitation Act**
The Rehabilitation Act of 1973 was amended in 1998 to include accessibility requirements for electronic and information technology (EIT). While Section 508 is applicable only to federal agencies, many governmental entities (including Jeffco) have incorporated Section 508 compliance into their own accessibility processes. In addition, recipients of federal funds may have Section 508 specific requirements. In practice, efforts to comply with Title II and HB21-1110 typically result in compliance with Section 508 requirements. The OIT Rules incorporate the Section 508 requirements into the Colorado accessibility standards.

Organizational Approach

Steering Committee

In 2023, Jeffco created a Steering Committee with a cross-representation of participants. The Steering Committee provides guidance regarding the strategic direction of the Digital Accessibility program, allocation of resources, prioritization of work, and communication of progress and risks. Priority concerns are escalated to the Steering Committee for resolution.

Working Groups

Additionally, we created nine working groups with an appointed leader and group members. A defined focus and scope were established for each working group. Working groups defined and assessed the inventories of their respective areas and prioritized their information and communication technology (ICT). Groups have or are determining an approach for remediation, modification, or accommodation, and continue to recommend and provide tools, processes, and training that may be utilized in the remediation of digital assets.

Jeffco prioritizes remediation of digital assets based on community usage and considering the available technical and human resources at a given time. We will be responsive to requests for specific inaccessible information and communication technology (ICT) and will respond with remediation, modification, or accommodation where resources permit.

The nine working groups, their defined focuses, and scopes are as follows:

Change Management, Training and Communications

- Apply Change Management principles to help people welcome, accept, and execute change.
- Identify and conduct, or acquire, digital accessibility Training to provide a foundation for county staff to make digital technology accessible, meet standards, and enhance
the user experience for everyone.
- Build a culture of accessibility by integrating accessibility into Communications for awareness across the County.

Content Strategy
- Design accessible content ensuring all users can access and interact with the material
- Ensure content is accessible to everyone in the audience from video captions and audio to error messaging and the use of color.
- Improve web pages ensuring all users can easily consume content.
- Work accessibility into processes so all can benefit from content.

Contracts and Procurement
- Create standard language for use in contracts for ICT.
- Inventory and prioritize existing contracts for ICT.
- Identify other accessibility requirements for the procurement process.
- Create ongoing digital accessibility practices.

Digital Signage, Kiosks and Public Tools
- Ensure virtual and in-person events and technology are digitally accessible.
- Ensure provided digital signage, kiosks and other devices are accessible and compatible with assistive technologies to include video and audio.

Job Descriptions
- Provide guidance, tools, and processes to ensure digital compliance in job descriptions.
- Identify job descriptions that need to be updated to ensure compliance and make changes as needed.
- Track progress towards compliance.

Planning
- Create Accessibility Statement.
- Develop process for accommodation requests.
- Create County Digital Accessibility Plan.
- Support other Working Groups’ prioritization and remediation efforts.
- Develop a process for tracking progress towards compliance.
- Track and resolve reported issues.

Policy and Procedures
• Inventory and prioritize policies, processes, and procedures for awareness and digital accessibility compliance.
• Update practices and procedures to be followed in compliance with legislation.
• Decide accessibility checkpoints.
• Work with owners to create and update their departmental policies and procedures.

Rulemaking Review

• Lead the County in participating in the rule development stages of the OIT rulemaking steps.
• Comment on potential rule topics by providing constructive input.
• Comment on draft rules and participate in hearings on proposed rules.
• Review adopted and posted rules, interpret and summarize to assist with the development of actions to be taken in support of the rules.

Technical Tools

• Identify Jeffco developed and managed 3rd party applications and owners.
• Inventory and prioritize applications, infrastructure, and website interfaces with owners.
• Collaborate with owners to identify and provide tools and resources they need to implement digital accessibility across our platforms.
• Decide accessibility checkpoints.

ICT Accessibility Goals and Strategies

Jeffco's goals, and strategies for achieving them, are designed to meet the evolving needs of members of the public and employees, while ensuring that we meet or exceed all applicable state and federal legal requirements. Jeffco recognizes, supports, and enhances diversity in all forms, and intentionally seeks inclusive approaches to ensure equitable access and engage communities around issues that matter to them. Our ongoing accessibility effort works towards the day when all Jeffco services, programs, and activities are accessible, providing equal access to information and services to all. Below, you'll find just some of our key strategies:

• **Staff Training, Awareness, and Empowerment** – Every employee in Jeffco who produces or is responsible for ICT is responsible for compliance. To assist staff with accessibility awareness and successful remediation, resources and training have been and continue to be developed and disseminated.

• **Procurement Guidelines, Vendor Engagement, and Accessibility Compliance** – Procurement process and contract reviews coupled with communication with vendors and partners creates a collaborative environment to ensure our standards are understood and met while enhancing our visibility to vendor product roadmaps.
• **Feedback and Continuous Improvement** – Internal and external communication channels provide continuous feedback loops for receiving and responding to questions and input.

• **Monitoring and Reporting** – Jeffco is dedicated to monitoring all digital equity initiatives. Monitoring allows us to transparently share progress, report on success metrics, and make data-driven decisions.

### Goal 1: Establish ICT Priorities

Jeffco prioritizes remediation of digital assets based on community usage and considering the available technical and human resources at a given time. We will be responsive to requests for specific inaccessible Information and communication technology (ICT) and will respond with remediation, modification, or accommodation where resources permit.

Jeffco will, on a recurring basis, inventory ICT in order to:

- Prioritize accessibility testing and remediation efforts. This effort will be based, where applicable, on:
  - OIT guidelines and recommendations for prioritization
  - Community impact and usage data
  - Legal requirements
  - Organizational capacity and limitations

- Track accessibility compliance, where applicable, based on:
  - Automated testing
  - Manual testing
  - Vendor-supplied documentation (such as VPATs)
  - Information received on the Digital Accessibility Request Form and documented resolutions

### Milestones

- **Inventory prioritization**: Working Groups reviewed the initial inventories and prioritized digital assets based on the criteria listed above.
  - We analyzed historical (2017 – 2023) and current 2024 Google analytics data for our main website: [www.jeffco.us](http://www.jeffco.us) and main Jeffco developed applications. The following metrics were reviewed:
    - Top Content Views
    - Top Outbound Clicks (What external links are citizens accessing)
Top Graphic Links Clicks (Where citizens are clicking on series of graphic buttons on our main landing and interior pages)

Top search terms.
- The above data enabled us to determine which public facing web pages and applications had the highest usage, allowing us to establish the top 6 applications for the 2nd quarter of 2024.
- Jeffco has drafted procurement contract digital accessibility language to be used in new contracts and updated in existing contracts, beginning with seven contracts identified as high impact based on data analytics related to traffic on our website.
- With nearly 3,000 PDFs hosted on our website, we have identified 200 high-attention PDFs that require remediation. We chose these documents based on Siteimprove utilization data.
- Jeffco inventoried public and internal facing kiosks, TV monitors needed for public virtual interaction, as well as two-way video devices at the Sheriff’s Office for visitor and inmate use. We prioritized based upon the community benefit of public-facing devices, resulting in approximately 150 separate devices.

**Barriers**

- **Third-Party Vendors**: Some vendors of third-party created and hosted applications may require accessibility changes to their products, though their priorities and roadmaps may differ from ours.
- **Data Accuracy & Impact on Prioritization**: At times, data regarding digital solutions may be missing or inaccurate. In such cases, Jeffco may encounter ICT prioritization challenges.

**Next Steps**

- **Third-Party Vendors**: Jeffco will continue to engage with vendors and work together to resolve discrepancies and better align roadmaps. Jeffco may identify alternative options to replace inaccessible solutions.
- **Data Accuracy & Impact on Prioritization**: Jeffco will continue to engage Working Groups to regularly evaluate current inventories for accuracy and completeness.

**Goal 2: Establish Expectation and Compliance Processes**
Jeffco will ensure that all employees are aware, through training and communications, of their responsibilities and ensuring that their work products and acquired ICT meet or exceed accessibility standards. Jeffco will:

- Provide digital accessibility information, training and support.
- Evaluate and procure accessibility tools to help employees be successful. Implement automated tools and manual testing.
- Establish mechanisms for users to provide feedback on the accessibility of ICT solutions; utilize feedback to identify and address accessibility barriers.

**Milestones**

- **Jeffco Branding Updates:** The Jeffco brand has been revised to comply with accessibility standards. We have updated the logos, fonts, and colors to ensure accessibility. These standards were adopted and shared with all county employees in June 2024.

- **JEN Project Landing Page:** In May 2024, the Jeffco Intranet Digital Accessibility Project page became available to all employees. The purpose of this page is to share relevant, current tools, and resources that are available to Jeffco employees.

- **Digital Accessibility Newsletter:** A Digital Accessibility Newsletter was developed and distributed to all Jeffco employees beginning in May 2024 and is scheduled for ongoing publication. The newsletter delivers up-to-date digital accessibility information and resources. Back-issues are available on the Jeffco Employee Network page (JEN).

- **Custom Training:** A Digital Accessibility self-paced virtual course was created internally for Jeffco employees and was made available in May 2024. This Digital Accessibility Essentials course explores the fundamental principles of accessibility while highlighting the importance of making digital content accessible. The course delves into what accessibility means, why it matters, how each of us plays a part in creating inclusive online spaces, and how to take responsibility for ensuring everyone can access online content.

- **Third-Party Training:** External third-party training and resources are available for Jeffco employees. These resources can be conveniently accessed on our intranet via the Digital Accessibility menu. The following training and resources are not intended to represent an inclusive list, but a shortlist of what is currently available to county employees.

  - Accessible Document Training Resources include:
    - Accessible Word Training
    - Accessible Excel Training
    - Accessible PowerPoint Training
    - Accessible PDF Training
  - Accessible Web Content Resources include:
• Accessibility (ADA) Checker - Overview
• Acronyms and Abbreviations
• Alt Text
• Alt Tex for Images
• Content Development Tips
• Documents – Linking
• Documents – Naming Convention
• Documents – Tagging
• Editor Widget – Label Abbreviations
• Editor Widget – Label Non-English Text
• Editor Widget – Label Quotes
• Editor Widget – Tables for Mobile Viewing
• Editor Widget – Use Subheads
• Headings, Labels and Section Headings
• Image and Slideshow
• Image Compliance and Accessibility – Overview
• Link Text
• Naming Conventions – Overview
• Page Tiles
• Pages – Overview
• Table Compliance and Accessibility

• Additional Accessibility resources include:
  o AccessiBe.com Article
  o CivicPlus – Accessibility Resources
  o CO State OIT Accessible Web Services Guide
  o Microsoft Accessibility – Connect with an Expert
  o Microsoft Accessibility Solutions – Live User Training
  o Section 508 website
  o Usability.gov website – improving the user experience
  o W3C website – Standards & Guidelines Overview
  o WebAIM – web accessibility in mind

• **CommonLook Accessibility Plugins:** Jeffco applied for and received Colorado Statewide Internet Portal Authority (SIPA) grant funding for licenses to remediate PDF documents. This Micro-Grant program is designed to connect residents to government by putting more information and services online. CommonLook licenses were assigned, software installs completed, and the tool is presently in use for PDF document remediation.

• **Manual Testing Process:** Jeffco has developed a custom Manual Testing Process. Manual accessibility testing is crucial, as automated tools are unable to identify all issues, particularly those pertaining to user experience and contextual factors. Human judgment is necessary to accurately evaluate the accessibility of a website or
web application. The Manual Testing Process document outlines the guidelines and procedures for conducting both automated and manual accessibility evaluations of digital services and products to ensure usability for individuals with disabilities. This document details the steps for assessing websites and web applications, serving as a foundation for product and service owners to develop tailored plans for their critical and high-visibility services based on specific business requirements.

- **Siteimprove**: Since 2018, Jeffco has been using a suite of tools from Siteimprove, Inc. to help identify and address issues that affect content quality, accessibility, search engine optimization, and more. The Accessibility module provides an immediate overview of the county's main website compliance levels, which removes guesswork and provides prioritization towards meeting current web accessibility standards (WCAG 2.1, AA) and industry best practices.

- **Accommodations Request Process**: It is essential to ensure that our community members can easily request accommodations or report non-compliant ICT to the county. We have established a robust process for submitting these requests, providing multiple methods for contact. Community members can make accommodation requests or report non-compliance via a web form on our website or by calling our Digital Accessibility phone number. This process documents and tracks all requests and reports in real-time. Resolutions are managed by the Digital Accessibility Coordinator in collaboration with a network of trained county contacts. We will regularly evaluate and improve this process to enhance efficiency and ensure high-quality customer service.

### Barriers

- **Provisioning Accessibility Solutions**: Cost is a significant barrier to securing and deploying accessibility solutions.

### Next Steps

- **Provisioning Accessibility Solutions**: Jeffco will continue to explore and expand access to accessibility tools and solutions, via contracting, grant applications, and other resources as available.

### Goal 3: Expand Accessibility Expertise

Expanding digital accessibility expertise within Jeffco is crucial for fostering an inclusive environment that accommodates all individuals, including those with disabilities. By enhancing our understanding and implementation of accessibility standards, we not only comply with legal requirements, but also demonstrate a commitment to social responsibility and equal access. This expertise ensures that our digital content and services are usable by a broader audience. Jeffco aims to enhance accessibility expertise by
recruiting and hiring employees dedicated to supporting accessibility initiatives, as well as providing additional training, tools, and resources to existing employees. Jeffco strives to empower all employees to become educated on accessibility standards and advocates for accessibility.

**Milestones**

- **Staffing:** Jeffco acknowledged the need to hire people with specialized knowledge and expertise in digital accessibility to guide our efforts. In addition, we committed existing resources to support the project and lay the foundation for continuous improvement. In response to this need, we:
  - Hired a Web Manager to take the lead on web page remediation and content strategy.
  - Hired a Digital Accessibility Coordinator to serve as a county subject matter expert on digital accessibility and equity.
  - Hired one full-time Project Manager and one contracted Project Manager to lead county-wide Digital Accessibility project efforts and mobilize resources within working groups.
  - Supplemented our team by securing an intern to focus on Digital Accessibility and equity efforts.

- **County-wide Technology Showcase:** Developing a Digital Accessibility Empathy Booth for the county-wide Technology Showcase. The Digital Accessibility Empathy Booth aims to raise awareness and promote understanding of digital accessibility challenges among Jeffco employees. The booth simulates various digital accessibility barriers and provides insights into the experiences of individuals with disabilities when interacting with technology.

- **Change Management Plan:** In keeping with Jeffco’s structured change management approach, we developed a county-wide Plan designed to bring awareness to the importance of the people component of the changes being made within the County for Digital Accessibility. We use a results-oriented model and enabling framework to facilitate a seamless transition from the current state to the future state by helping people welcome, accept and execute the necessary changes.

- **One-on-One Support:** Created office hour bookings where Content Strategists use automated scheduling tools to secure a one-on-one time with Digital Accessibility resources to receive support with remediation activities. The Web Manager also scheduled one on one meetings with Department and Division leaders to discuss digital accessibility and offer support.

- **Guidance & Job Aids:** Developed and distributed guidance documents and job aids to all Jeffco Content Strategists to aid in the remediation of digital products.

**Barriers**
• **Staffing:** Budgetary limitations create challenges to continue expanding the Digital Accessibility Project Team beyond our current efforts.

## Next Steps

• **Staffing:**
  - We are expediting the integration of our digital accessibility new hires and promoting their expertise and availability to all other Jeffco employees.
  - Formalizing professional duties related to accessibility for existing employees is underway, though not completed at this time.

### Solutions and Statuses

#### Accessibility Findings

Jeffco is currently auditing, testing, and remediating a wide variety of ICT. The following addresses trends identified during these processes, any defined resolution plans, and the status of individual products.

#### Applications and Websites

Since 2018, Jeffco has employed a suite of tools from Siteimprove, Inc. to identify and resolve issues impacting accessibility, content quality, search engine optimization, and other areas. The Accessibility module provides an immediate overview of the county’s main website compliance levels, removing uncertainty and enabling prioritization to meet current web accessibility standards (WCAG 2.1, AA) and industry best practices.

The following solutions snapshot **excludes** resources that are used exclusively for internal purposes. Only publicly available ICT owned and managed by Jeffco are shown below.

ICT statuses have been determined through systemic scanning with automated tools and manual testing.

The industry benchmark represents the average score for websites using Siteimprove within the United States and the government sector. This benchmark enables Jeffco to assess the performance of our digital services relative to other government entities. Currently, Jeffco surpasses the industry benchmark in four out of six digital services.

Below are the current Accessibility Scores for Jeffco’s initial targeted digital services:

#### Vendor Progress
Since 2017, the county’s Web Team has maintained an ongoing partnership with the primary vendor of our main county websites, to prioritize accessibility. Below are key activities that are planned for 2024:

- A mini redesign is scheduled to kick off in Quarter 3 for our main www.jeffco.us website. The site is undergoing a redesign focused on enhancing navigation, page load times, and the accessibility of widgets, code, and content. Content strategists are currently reviewing content and addressing any related issues.
- Our vendor has been transparent about accessibility improvements during quarterly releases since 2023, a practice that will continue into 2024. Training materials and webinars are accessible on JEN to promote awareness.
- In August 2024, the Jeffco Web Team will convene with the vendor accessibility team to assess our compliance status with WCAG 2.1 AA, receive an update on VPAT status, and collaborate on a unified accessibility roadmap for achieving WCAG 2.1 AA compliance.

Documents

Jeffco publishes a wide variety of documents including Google Docs, PDFs, and Microsoft Office documents. Jeffco employees create and share, for internal work purposes, a significant volume of documents.

- Data below addresses only publicly available documents published or made available through the Jeffco website.
- Known accessibility issues are included only for documents that have been audited or tested; A significant number of documents have not yet been evaluated.
- A significant volume of publicly available documents are no longer in active use and will be evaluated for archival or deletion consistent with the County’s retention rules.

PDFs

Jeffco hosts nearly 3,000 PDFs on our website. Of these, we are focusing our remediation efforts on the top 200 high-attention documents. Given their technical and complex nature, we have implemented a phased remediation approach targeting 50% of the 200 high-attention documents in quarter three and the remaining 50% in quarter four. These documents include but are not limited to reports, forms, guidelines and maps.

Status of PDF Remediation Efforts

As of the current reporting period, the status of our prioritized PDF remediation efforts is as follows:

- **Total Public-Facing PDFs Prioritized:** 200
Additional Efforts for Document Remediation

To support this initiative, we have completed audits with each Jeffco division, advising them on a recommended process for PDF remediation. A comprehensive guidance document outlining best practices and step-by-step instructions for remediation has been provided to each division. Additionally, we have conducted a PDF remediation training session to equip our web contributors with the necessary skills and knowledge to perform remediation tasks effectively. Organization-wide, we are developing accessible templates, such as Word documents and presentations, to ensure documents are created with accessibility in mind rather than relying on retroactively remediating documents.

Formal Approval

Name and Title: Rebecca Hascall, Director Business Innovation & Technology
Date of approval/last updated: June 27, 2024