Intro:

Under Title II of the Americans with Disabilities Act (ADA), local governments are prohibited from discriminating against individuals on the basis of disability in spaces of public accommodation. The Department of Justice (DOJ), which enforces the ADA, has interpreted this to include access to online technology. Further, under Colorado House Bill 21-1110, local governments must meet the statewide accessibility standards as of July 1, 2024.

The City of Salida is dedicated to ensuring online accessibility for all users of City Information and Communication Technology ("ICT"). In pursuit of this commitment, this Accessibility Plan (the "Plan") has been formulated to identify and address online barriers that may impede accessibility for individuals with disabilities.

This Plan serves as the City's strategic framework for the ongoing enhancement of the accessibility of the City's ICT. This Plan provides information on the following:

(1)   Annual status updates detailing the process of advancing the accessibility of the City's ICT.

(2)   Prioritizes the City's ICT for accessibility.

(3)   Steps the City is taking to remove accessibility barriers to its ICT.

(4)   Timelines for addressing inaccessible ICT and plan for providing reasonable accommodations in the interim.

(5)   Policies for testing and remediating City ICT.

Scope:

This Plan applies to all City ICT that is (i) public-facing or internal-facing; (ii) is procured, developed, or maintained by the City, and (iii) is in active use or was created, developed, acquired, or purchased on or after July 1, 2024. This Plan also applies to any ICT that does

not satisfy such criteria when a request for reasonable accommodation is made for such ICT.
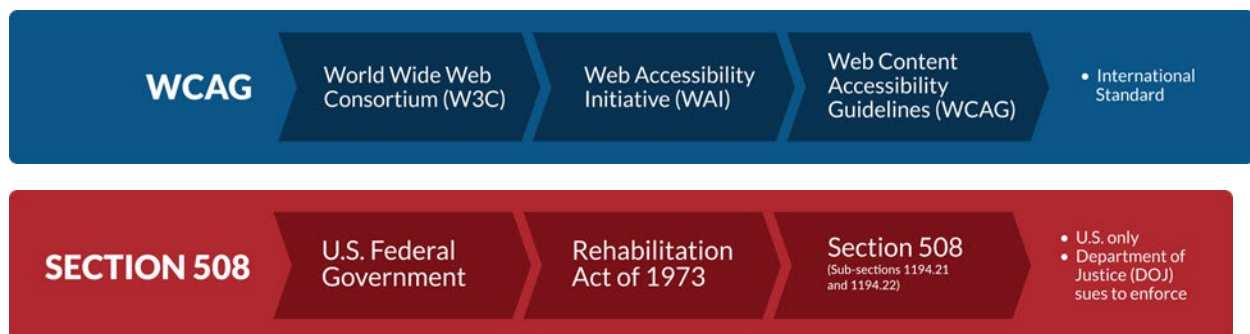
Web Content and Accessibility Guidelines:

The State of Colorado's Technology Accessibility Rules require the City to adhere to WCAG 2.1, Level AA, and Section 508 accessibility standards.

WCAG and Section 508 are different guidelines for accessibility, with WCAG addressing a more in-depth level of accessibility than 508.

Section508.gov

W3.org/WAI/standards-guidelines

WCAG	World Wide Web Consortium (W3C)	Web Accessibility Initiative (WAI)	Web Content Accessibility Guidelines (WCAG)	• International Standard
SECTION 508	U.S. Federal Government	Rehabilitation Act of 1973	Section 508 (Sub-sections 1194.21 and 1194.22)	• U.S. only • Department of Justice (DOJ) sues to enforce

Images from civicplus.com/blog

Website Platform:

The City is currently using the CivicPlus platform powered by Drupal. This content management system is built to be highly compliant with the ADA (Section 508) and WCAG 2.1 A and AA levels. CivicPlus is the leading government website provider and leader in accessibility and compliance.

References:

1. Section 508 of the U.S. Rehabilitation Act of 1973

2. C.R.S. 24-85-104, ARTICLE 85. "INFORMATION TECHNOLOGY ACCESS FOR INDIVIDUALS WHO ARE BLIND OR VISUALLY IMPAIRED"

3.   State of Colorado Technical Standard TS-OEA-001: Technology Accessibility for Persons with Disabilities

4.   State of Colorado Technical Standard TS-OEA-002: Technology Accessibility for Web Content and Applications

5.   https://www.w3.org/ for comprehensive WCAG 2.0 standards

Annual Status Updates:

The City of Salida will provide an annual status update detailing its progress in advancing the accessibility of its ICT. The Accessibility Plan Progress Report demonstrates the dedication to implementing the first Accessibility Plan for 2024 in compliance with HB 21-1110. This progress report highlights achievements in fostering diversity and creating a barrier-free environment. The status update will outline remediation efforts and improvements to accessibility on all City ICT.

Prioritization of City's ICT for accessibility:

The City of Salida uses Monsido to prioritize ICT accessibility. Monsido automatically scans ICTs for possible issues that may hinder accessibility and provides recommendations on how to address them.

Accessibility will be prioritized based on:

Priority 1	Critical	High traffic; high impact	Ex. Home page, news release, accommodation requests, new documents
Priority 2	High	Opportunity that an end user has of encountering issue	Ex. Recreation, Events, Employment, Police, Street Maintenance
Priority 3	Medium	Periodic or seasonal use	Ex. Bids, RFPs, Budget, Meeting Agendas, Permitting, Forms, Engineering, GIS
Priority 4	Low	Low or no traffic	Planning, City Closures, Proclamations, Ordinances, Archive Documents

Steps the City is taking to remove accessibility barriers to ICT:

This plan will follow the below implementation strategy for broadly meeting WCAG 2.1 (Level AA) Accessibility Standards.

- Conduct weekly accessibility audits of website pages, PDFs, forms, and other integrated tools with assistance from Monsido (a website accessibility monitoring tool).
- Accessibility content violations will be documented through Monsido and provide metric data on historical compliance and improvements over time.
- Current ICT documents such as forms and PDFs will be remediated based on prioritization level.
- Archival of historical ICT documents.
- Notice to users on webpages with 3rd party links that they are leaving the City's website.
- Establish accessibility compliance (based on current standards at the time) as a requirement when evaluating 3rd party products that will be used in conjunction with the website.
- If information cannot be made accessible without undue burden or fundamentally altering the nature of the ICT, it will be made available in an alternate format.

Timelines for addressing inaccessible ICT and plan for providing reasonable accommodations in the interim:

The City of Salida is committed to addressing inaccessible ICT. ICT shall conform with the standards at the earliest time that does not present an undue financial, technical, or administrative burden.

Priority 1 & New ICT	Critical	July 1, 2024
Priority 2	High	July 1, 2025

Priority 3	Medium	July 1, 2025
Priority 4	Low	Remediated or archived by July 1, 2026

Until all remediations are conducted, the City will address accommodation requests case-by-case. Each request will be responded to as quickly as possible based on staffing, undue burden, and remediation needs. For future updates to W3C WCAG guidelines, all ICT will meet conformance levels A and AA of the most current non-draft version of the guidelines within two (2) years of the release date.

Policies for testing and remediating ICT:

The City is committed to maintaining transparent and accessible ICT through/by:

- Continued use of Monsido, an accessibility auditing tool.
- Audits identifying accessibility issues and remediation.
- A notice on the website with the City's ICT Accessibility Statement and Plan. A telephone number and email address for visitors to request accessible information and services or to give feedback about how accessibility can be improved.
- Periodically enlist disability groups to test ICT for ease of use; use their feedback to improve accessibility.
- Ensure all ICT updates and modifications are made accessible.
- Ensure key staff responsible for ICT receive ongoing training to stay current on compliance standards and requirements.
- Annual training for any staff (e.g., administrators, faculty, support staff, employees) responsible for creating or distributing information with online content to employees, residents, and visitors of the City, including but not limited to training on the City's ICT Plan, and their role and responsibilities to ensure that ICT design, documents, and multimedia content are accessible. The training will be facilitated, in whole or in part, by an individual with sufficient knowledge, skill, and experience to understand and employ the technical standard(s) adopted by the City.
- Third-party vendors will be advised that the ICT content provided to the City needs to be accessible. If information cannot be made accessible without undue burden

or fundamentally altering the nature of the program, it will be made available in an alternate format.