LAKEWOOD DIGITAL ACCESSIBILITY TRANSITION PLAN

Lakewood
Full of Possibilities.

Document revision history

Revision	Date	Author	Description
1.0	5/6/2022	O.Kudzme	Created
1.5	2/20/2024	Yvette Florez	Updates made to align with our accessibility maturity framework.

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Overview

Beginning in February 2022, the City of Lakewood initiated a far-reaching, ongoing process to ensure that individuals with disabilities have equal access to public information presented or stored electronically by the city. This process aims to not only bring the city into compliance with Colorado Laws for Persons with Disabilities (HB21-1110), but more importantly, to equally serve people with disabilities as we work to build an inclusive community.

MANDATED BY: House Bill 21-1110:

"'Accessible' or 'accessibility' means perceivable, operable, and understandable digital content that enables an individual with a disability to access the same information, engage in the same interactions, and enjoy the same services offered to other individuals, with the same privacy, independence, and ease of use as exists for individuals without a disability."

COMPLIANCE BY: July 1, 2024, and ongoing.

APPLIES TO: Any department, agency, special district, or other instrumentality of a state or local government.

PENALTIES: A person with a disability may bring a civil suit, with fines of $3,500 payable to each plaintiff for each violation. Additionally, there is the possibility of court-ordered remediation, and judgements for actual monetary damages.

STANDARDS: Worldwide Web Consortium and other applicable industry standards.

SCOPE: All digital touchpoints & digital content

DIGITAL TOUCHPOINTS could include any electronic channel where the city provides information or interacts with the public or employees:

- Websites, both external and internal
- Public engagement platforms, such as Lakewood Speaks and Lakewood Together
- Internal and external software applications (SaaS, COTS, custom)
- Informational kiosks or screens
- E-newsletters
- Online forms, contracts, administrative regulations
- Digital signage

DIGITAL CONTENT could include things like:

- Agendas and packets for City Council and other public bodies
- Documents: Word, PowerPoint, Excel & PDFs, signage
- Media: video, images, social media posts
- Applications
- Hiring and onboarding materials
- Colorado Open Records Act (CORA), Colorado Criminal Justice Records Act (CCJRA), and other records requests

PLAN:

This plan intends to provide flexibility to integrate accessibility holistically through our culture and processes. This plan will include how we inventory, conduct testing, and validate standards conformance, and are developed to address accessibility issues once identified. Our core criteria include internal communications regarding accessibility process improvement, resources, and training, public statements of compliance and public representations of the digital accessibility program. We are responsible for procurement and vendor management related to solicitation, evaluation, and contract processes to address IT accessibility to meet technical standards and compliance. We will ensure that IT accessibility requirements are incorporated into technology lifecycle activities such as enterprise architecture, design, development, testing, deployment, and ongoing maintenance in a consistent, repeatable fashion.

Governance, Roles, and Responsibilities

We will ensure that IT accessibility is positioned appropriately within our city and that accessibility-related roles and responsibilities are defined. We will build organizational awareness of the need to support people with disabilities as an ongoing process, and to comply with state law.

Governance Area		Role	Responsibilities
Business Systems Management		IT Application Team	Apply digital accessibility standards and best practices to support and maintenance of business systems. Work with third-party business system providers to promote accessibility standards. Identify platform owners and content owners responsible for IT touchpoints/products. Test and remediation duties.
Procurement and Vendor Management		IT Business Technology Division	Update procurement guidelines and standards for technology. Organize ongoing assessment of the accessibility of city technologies
City Digital Content Management		City Manager's Office	Promote web accessibility awareness internally. Respond to user inquiries related to web accessibility. Perform automated accessibility testing and fix issues
Records Management		City Clerk's Office	Identify inaccessibility online PDFs and remediate. Identify PDF content that should be converted to website or deleted.
Training		Human Resources ADA Coordinator	Prepare and provide accessibility training and guidance
City Culture			Adhere to accessibility compliance standards. Attend accessibility training as provided by Accessibility Coordinator

			Champion accessibility best practices
Digital Accessibility Program			Change Management Digital Accessibility Metrics Update grievance procedure. Coordinate city's compliance with the Digital Accessibility Plan and Policy

Evaluation and Remediation

We will work with all departments to complete an inventory of their digital touchpoints and digital content that needs to be updated for accessibility compliance. This inventory will include websites, applications, PDFs, digital signage, etc. We will track and keep records of tools, procedures, decisions, and improvements of IT accessibility.

We will prioritize the digital touchpoints and digital content that does not meet accessibility compliance for remediation and a plan for accommodations. We will update existing content and ensure new content meets standards.

- PDFs: delete when outdated, convert to HTML pages, when possible, update to accessible PDFs when necessary
- Review current online content for compliance, and update as needed.

Our testing approaches will include third-party testing, assistive technology, and integrated testing by users with disabilities.

Skills and Training

We will hire people with accessibility skills and train current employees in skills related to providing accessible services to meet standards and compliance. At a minimum training includes:

	Citywide Leadership	Records Managers & Liaisons	Content Creators and Editors	Business System Administrators	Contract & Vendor Mgrs.	All Employees
Introduction – Understanding Web Accessibility						X
Creating Accessible Word & PDF Documents, and Emails						X
Creating, Testing & Repair Techniques for Web Content			X			
Testing & Repair Techniques for PDF documents			X		X	
Testing & Repair Techniques for Accessible Apps				X	X	
Leading Through Accessibility Change						X
Change Management and Accessibility						X

Communication and Support Process

We will track and resolve incoming accessibility complaints and ensure a clear channel for receiving feedback on IT accessibility issues. In addition, we will add accessibility statements and an accessibility contact on all city websites and applications and integrate accessibility content into agency communication plans.

Procurement and Vendor Management

Our solicitation, evaluation and contract processes will address IT accessibility for standards and compliance. We will do this through:

- Contact vendors to ensure they are aware of new state laws and requirements.
- Review and update existing contracts and contract language to include digital accessibility.
- Begin requiring compliance with all contracts and vendors.
- Annually review contract agreements and compliance with digital accessibility

Vendor Contract Management & Compliance

Software Applications Lifecycle

Accessibility requirements will be incorporated into technology lifecycle activities such as selection, procurement, deployment, and ongoing maintenance.

Exceptions

The accessibility standards do not apply in the following cases:
- Archived web content
- Individualized, password-protected, conventional electronic documents about a specific individual, their property, or their account; and password-protected or otherwise secured.
- Complex and/or atypical images and diagrams, including:
  - Blueprints
  - Architectural drawings
  - Technical drawings
  - Site plans, development plans, and maps
  - Plat maps.
  - Complex comprehensive tables and charts (must include a link to a text description of the table or chart)
  - Handwritten documents
  - Any image where there is no logical methodology to create an alternate description that will make the image understandable to assistive technology.

Content that has been archived is not subject to compliance.
Portable documents excluded:
- Blueprints
- Architectural documents
- Complex images or diagrams
- Scanned publications
- Technical drawings
- Site plans, development plans and maps
- Comprehensive tables and charts

When requested, the t the city will provide reasonable accommodation for alternative access to the items excluded.