

Digital Accessibility Transition Plan

Created by Nelnet Government Services, Nelnet, Inc.,
for the City of Manitou Springs, Colorado

Adopted by City Council April 16, 2024



Digital Accessibility Transition Plan

City of Manitou Springs, Colorado

Table of Contents

Introduction	2
Overview of Applicable Laws, Regulations, and Standards	3
Section 504	3
ADA Title II	3
Colorado HB 21-1110.....	4
Web Content Accessibility Guidelines (WCAG)	4
Manitou Springs Digital Accessibility Assessment	4
Assessment Results.....	4
Milestones for Remediation.....	7
Milestone Timeline	7
Milestone Details	8
Process Development Plan	10
Responsibilities	11
Testing/Auditing.....	11
Public Participation.....	12
Training	12
Procurement of Accessible Software.....	13
Assessing Organizational Accessibility Maturity.....	14
Digital Accessibility Requests.....	14

How to Make a Request.....	14
Complaint Process.....	15
How to File a Complaint.....	15
Timeline for Complaints.....	16
Progress & Updates.....	16
Update History.....	16
Glossary of Terms.....	17
Resources.....	17

Introduction

The city of Manitou Springs is committed to ensuring all members of our community have access to our digital information, tools, and resources. Manitou Springs works towards compliance with Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act (ADA), and Colorado House Bill 21-1110 while promoting inclusion of people with disabilities.

Because the city seeks continuous improvement to its digital accessibility, the city engaged with the Nelnet Government Services to assess its digital accessibility and identify gaps that may exist between digital content and required accessibility. The outcome of that engagement is this document which has a three-fold purpose: 1) provide foundational laws, regulations, and standards that underpin accessibility requirements; 2) describe the findings of Nelnet’s assessment of Manitou Springs’ current digital content through the lens of required accessibility; 3) outline the city’s plan for a) achieving and maintaining Web Content Accessibility Guidelines (WCAG) 2.1 AA conformance and b) providing evidence of making good faith progress toward removing accessibility barriers to comply with Colorado’s Accessibility Rules in subsection B under section 11.7 Compliance.

These three elements form the Digital Accessibility Transition Plan for Manitou Springs. The plan describes the what - gaps between current state Manitou Springs’ digital content and required accessibility – the how – actions to close those gaps – and the development of processes which allow Manitou Springs to lay a foundation for achieving and maintaining official accessibility.

Correspondingly, this document has three primary sections:

1. An Introduction which provides an overview of laws, regulations, and standards for digital accessibility requirements. This provides the source of the digital accessibility requirements.
2. Nelnet Government Services' assessment of Manitou Springs' digital accessibility. The assessment includes current state and recommended remediation. Manitou Springs has completed some of the recommended remediation; in this way, this section is both about current state and desired future state. Nelnet's assessment is an input into the specific tasks Manitou Springs will complete to achieve accessibility compliance. Those tasks are transformed into milestones to measure achieving accessibility compliance. **Note:** Some of the milestones, such as Conduct Inventory, have been completed by Manitou Springs.
3. A Process Development Plan. This section is future focused: it details how the city will maintain and improve digital accessibility into the future. It also includes an overview of the complaint and accommodation processes and the city's plan for maintaining accessibility.

This is a dynamic document that will be regularly reviewed and updated as the city works toward compliance.

Overview of Applicable Laws, Regulations, and Standards

This section provides a high-level understanding of the applicable laws, regulations, and standards that govern digital accessibility requirements. These requirements are inputs into accessibility assessment and identifying gaps.

Section 504

Section 504 of the Rehabilitation Act of 1973 applies to any organization that receives federal funding or assistance. It requires that individuals with disabilities are provided with equal access to participate in any program, service, or activity that receives federal funding.

ADA Title II

The American with Disabilities Act (ADA) is a federal civil rights law that prohibits discrimination against people with disabilities. Title II of the ADA specifically applies to

state and local governments and requires that people with disabilities have equal opportunity to participate in programs, services, and activities.

Colorado HB 21-1110

Colorado House Bill (HB) 21-110 expands on the Colorado Anti-discrimination Act (CADA) by defining discrimination to include excluding an individual with a disability from participation in or being denied the benefits of services, programs, or activities provided by any Colorado government entity. It specifically applies to information technology and sets July 1, 2024, as the date that all government digital content must be compliant with WCAG 2.1 AA.

Web Content Accessibility Guidelines (WCAG)

WCAG is the internationally recognized standard for accessible web content. It was created and is maintained by the WCAG Working Group of the World Wide Web Consortium (W3C). WCAG contains a list of testable success criteria to ensure that web content adheres to the principles of being perceivable, operable, understandable, and robust for all users. It is further broken down into three conformance levels with A being the lowest and AAA the highest. The latest version of WCAG is 2.2, published in October of 2023.

Manitou Springs Digital Accessibility Assessment

Manitou Springs, in partnership with Nelnet Government Services, conducted an accessibility assessment of its websites, applications, and digital documents in July 2023. Using WCAG Website Accessibility Conformance Evaluation Methodology (WCAG-EM), a representative sample was selected from each of six prioritized web products. These samples were audited to test conformance with WCAG 2.1 Level AA, using a combination of automated and manual testing processes including testing with assistive technology.

Assessment Results

Nelnet's assessment revealed potential web accessibility barriers on the city's web pages that may hinder access for individuals with a diverse range of functional capabilities.

In the following table, the potential barriers are listed by each city web page in individual rows. The third column of each row shows the total potential barriers identified for that web page. Below the total for each web page appear the user groups affected, ranked in barrier count in descending order.

Product	Audited content	Total barriers and user groups affected
Manitou Springs Main Website	Web pages: <ol style="list-style-type: none"> 1. Manitou Springs homepage 2. Parking Locations 3. Manitou Incline 4. Elections 2023 5. Carnegie Library 	Total – 58 Blind individuals - 42 Individuals with mobility impairments that impact computer usage - 18 Individuals with low vision and colorblindness - 11 Individuals with cognitive disabilities and neurodiverse individuals - 3
Manitou Springs Volunteer Fire Department	Web page: <ol style="list-style-type: none"> 6. Homepage 	Total – 11 Blind individuals - 5 Individuals with mobility impairments that impact computer usage - 3 Individuals with low vision and colorblindness - 5 Individuals with cognitive disabilities and neurodiverse individuals - 1
Manitou Springs Municipal Code	Sample municipal code:	Total – 5

Product	Audited content	Total barriers and user groups affected
	7. Chapter 18.32 - VARIANCES	Blind individuals - 5 Individuals with mobility impairments that impact computer usage - 1
Manitou Springs Document Center	Sample PDF: 8. City Council Agenda, June 20 2023	Total – 4 Blind individuals - 4
Manitou Springs Parking Forms	Web pages related to the Parking Permit Application process.	Total – 15 Blind individuals - 13 Individuals with mobility impairments that impact computer usage - 3 Individuals with low vision and colorblindness - 3 Individuals with cognitive disabilities and neurodiverse individuals - 2
SeeClickFix Manitou Springs	Web pages and mobile app pages (iOS and Android) related to the graffiti report process.	Total – 16 Blind individuals - 11 Individuals with mobility impairments that impact computer usage - 7 Individuals with low vision and colorblindness - 4

Milestones for Remediation

The following table provides milestones for remediation of identified accessibility issues and target dates for completion. Milestones aid in organizing the work, and target dates help in planning and tracking the work’s progress. Together, the milestones and their completion status measure Manitou Springs’ success in remediating the potential barriers.

Milestone Timeline

Milestone	Status
External Applications Compliance	Target Completion Date: January 1, 2025
Targeted Remediation of Issues Identified in the Assessment	Target Completion Date: January 1, 2025
Conduct Inventory	Completion Date: January 31, 2024
Remediation of prioritized content <i>Note: Timeline is dependent on budget and resources for remediation. Manitou Springs will make good faith efforts to make content accessible by the targeted dates, and any individual who needs an accommodation for content that has not yet been made accessible should submit an Accessibility Request.</i>	Target Completion Dates: <ul style="list-style-type: none"> • High priority content: January 1, 2025 • Medium priority content: June 1, 2025 • Low priority content: October 1, 2025
Initial Staff Training	Completion Date: March 27, 2024
Implement Internal Accessibility Policies	Target Completion Date: January 1, 2025
Enhance Accommodations Process	Target Completion Date: October 1, 2024
Assessing organizational accessibility maturity	Target Completion Date: January 1, 2025

Milestone Details

Each of the milestones in the above table are described in detail in this section.

External Applications

Manitou Springs has shared the Digital Accessibility Assessment with vendors of third-party applications used by the city and is working with vendors to ensure all accessibility barriers identified in third-party applications are addressed to meet WCAG 2.1 Level AA compliance.

Long-term plans for ensuring accessibility in the procurement process are included in the Process Development Plan.

Targeted Remediation of Issues Identified in the Assessment

Manitou Springs has manually remediated specific issues identified in the Digital Accessibility Assessment that are within Manitou Springs' control. This includes fixes such as improving the semantic structure of pages, changing colors to pass color contrast requirements, and adding appropriate alternative (alt) text to images.

Conduct Inventory

Manitou Springs has taken inventory of all web pages, applications, and digital documents. Any of the digital content that is in active use will be prioritized for remediation.

Content will be prioritized for remediation using the following criteria:

- High – this includes the top 25% of highest-trafficked pages, as well as pages and document used for accessing essential city services, programs, or activities. Additionally, any content for which Manitou Springs has received a complaint will move to the top of the priority list.
- Medium – lower trafficked pages and content that does not currently have an alternate accessible format.
- Low – Informational content that is available in an alternate accessible format.
- Exclusions – Content identified as inactive will be either removed or archived if it needs to be retained for reference or recordkeeping purposes.

Remediation of Prioritized Content

Manitou Springs will remediate all content that is required to meet accessibility standards in order of priority:

- High priority content: January 1, 2025
- Medium priority content: June 1, 2025
- Low priority content: October 1, 2025

The ADA Coordinator will supervise remediation efforts and will work with content creators to ensure all digital content is made compliant. Remediation will consist of using accessibility testing checklists to check content, paying particularly close attention to common issues found in the assessment report. Any issues identified will be fixed to meet WCAG 2.1 AA compliance.

Training

Staff members who create web content and digital documents will receive comprehensive training on creating accessible web pages, PDFs, and Microsoft Word documents. This training will aid in remediation efforts and help ensure that all future content is created following accessibility best practices,

In addition to training on tools, staff will receive training on publishing accessible content. Manitou Springs reviewed its publishing platforms as part of the Digital Accessibility Assessment. This led to a better understanding of how to publish accessible content, and this knowledge will be an input to the training content. It will also be an input to process improvements.

The long-term plan for training is included in the Training section of the Process Development Plan.

Implement Internal Accessibility Policies

To maintain accessibility going forward, Manitou Springs will implement the policies detailed in the Process Development Plan. This plan includes

- creating the role of ADA Coordinator; the person in this role will be responsible for oversight of accessibility
- conducting regular testing and auditing
- requiring new hire and refresher accessibility training

- ensuring that all software and digital products and services purchased from vendors conform to accessibility guidelines.

Enhance Accommodations/Accessibility Request Process

To better serve people with disabilities, Manitou Springs will update its accommodation/accessibility request process to provide

- better visibility on how to submit a request
- clear responsibilities for responding to and processing requests
- expected timelines for responding to and completing a request.

Details on how these processes will be enhanced can be found in the Digital Accessibility Requests section of the Process Development Plan.

Assessing Organizational Accessibility Maturity

Manitou Springs will use the Colorado IT Accessibility Planning Template as a framework to evaluate the overall accessibility of the city's culture and practices. The Accessibility Planning Template will assist in

- assessing the current effectiveness and capabilities of accessibility practices
- identifying gaps between current practices and the next level of accessibility maturity
- providing guidance on improving accessibility over time.

Manitou Springs will complete the Colorado IT Accessibility Planning Template by September 1, 2024, and will update it annually thereafter.

Process Development Plan

While the previous two sections describe how Manitou Springs will achieve accessibility compliance, this section's goal is to detail how the city will maintain and improve digital accessibility into the future. The Process Development Plan includes policies regarding

- responsibilities
- testing and auditing
- training
- procurement of accessible software

- public participation
- assessing accessibility maturity.

Responsibilities

The city will designate an ADA Coordinator who will be responsible for ongoing oversight and maintenance of digital accessibility.

The ADA Coordinator's essential responsibilities include:

- overseeing the accessibility request and complaint processes
- ensuring remediations are completed in a timely manner
- monitoring progress of the transition plan
- annually reviewing and maintaining the Transition Plan and Process Development Plan

Additional duties may also include

- promoting accessibility awareness internally
- maintaining the inventory of digital content prioritized for remediation
- providing accessibility training and guidance
- conducting ongoing assessments of the accessibility of digital content
- coordinating with external entities performing accessibility audits
- evaluating accessibility when procuring third-party products/services
- preparing annual accessibility status reports for presentation to the City Council

The person designated as ADA Coordinator should have knowledge of relevant accessibility laws and standards and training necessary to complete the tasks detailed in this plan.

Testing/Auditing

The ADA Coordinator is responsible for ensuring that regular accessibility testing and auditing is performed.

- Testing will be performed to ensure accessibility of digital content whenever it is published or when existing content is updated. When publishing new or updating existing web pages or digital documents, content creators will

- use accessibility testing checklists to check for common issues such as keyboard interoperability, appropriate alt text on images, accessible labels, and correct use of semantic elements
- correct findings from Audioeye’s automated accessibility testing on pages using Audioeye.
- Periodic accessibility audits will be performed to help measure the current state of accessibility and to guide resources for maintaining and improving accessibility.
 - Audits will be performed annually, at minimum.
 - Audits may be performed internally or by third-party accessibility auditors.
 - Audits should test for conformance to WCAG 2.1 AA, or the minimum standard defined in the latest version of the State of Colorado’s Office of Information Technology (OIT) Technology Accessibility Rules.
 - A representative sample of each single digital product will be audited. Representative samples should include high-traffic pages and documents, web pages that have common components used throughout a website, and randomly selected content.
 - Audit results should be included in the ADA Coordinator’s annual accessibility status report.

Public Participation

Manitou Springs seeks input from our community to guide policy decisions impacting digital accessibility and in evaluating the success of accessibility compliance efforts.

The ADA Coordinator should establish methods for the public to participate, which may include public hearings, meetings, or public committees.

Training

The ADA Coordinator should be responsible for ensuring all necessary accessibility training is carried out.

- New hire training
 - All new hires who will be creating/editing digital content will receive basic accessibility training.

- Job duty training
 - All new hires or people transitioning to positions with new job duties will receive accessibility training relevant to their duties. Job duty and relevant training examples include a) a person performing the required job duty of updating web pages should receive HTML accessibility training and b) a person performing the required job duty of creating digital documents should receive training in Microsoft Word and PDF accessibility.
- Refresher training
 - All city employees who create/edit digital content should regularly receive refresher training to reinforce skills and stay up to date with the latest accessibility tools and techniques. Refresher training should occur annually, at a minimum.

Procurement of Accessible Software

Accessibility conformance is required for all procured digital products and services, unless conformance would present an undue financial, administrative, or technical burden. Any department purchasing digital products or services should contact the ADA Coordinator for assistance in determining conformance or undue burden.

Manitou Spring uses the Standard Operating Guide for Procuring Accessible Technology for the State of Colorado for guidance when evaluating software. These process steps include

- soliciting accessibility information such as Accessibility Compliance Reports (ACRs) as part of the bid process
- validating accessibility information, preferably through demos or internal evaluations
- requiring that vendors maintain conformance with WCAG 2.1 AA, or the minimum standard defined in the latest version of the OIT Technology Accessibility Rules in contracts.

When necessary, Manitou Springs may also use the expertise of external entities to help evaluate the accessibility of products and services.

Assessing Organizational Accessibility Maturity

The ADA Coordinator should be responsible for annually completing the Colorado IT Accessibility Planning Template. This document is framework to evaluate the overall accessibility of the city's culture and practices. The Accessibility Planning Template will assist in

- assessing the current effectiveness and capabilities of accessibility practices
- identifying gaps between current practices and the next level of accessibility maturity
- identifying where improvements can be made to remove barriers.

The completed Accessibility Planning Template should be included in the ADA Coordinator's annual accessibility status report.

Digital Accessibility Requests

Manitou Springs is committed to supporting access to digital content and services, programs, and activities for people with disabilities. If an individual encounters inaccessible digital content and would like to report an issue or request services, they may submit a digital accessibility request.

Sample digital accessibility requests:

- An individual encounters an accessibility issue on the city's website and would like to report it so that it can be fixed.
- An individual would like to request that inaccessible inactive/archived digital content be made accessible.
- An individual needs an accessible version of digital content that is to be presented in an upcoming city meeting.

If content cannot be made accessible, Manitou Springs will make reasonable accommodations or modifications for alternative access unless such modifications would present an undue burden or fundamentally alter the nature of the service, program, or activity.

How to Make a Request

Currently, requests are submitted using the complaint process. Manitou Springs makes every effort to process requests efficiently and within a reasonable time frame; however,

processing times will vary depending on the nature of the request. To ensure an accommodation is in place before a scheduled event, individuals are encouraged to make requests in advance of the event and as soon as possible.

Note: Manitou Springs will be enhancing the request process as part of this transition plan and will update this document when new processes become available.

Complaint Process

Any person who perceives themselves as having experienced discrimination based on disability by Manitou Springs' digital content can lodge a complaint either independently or through an authorized representative. It is imperative to promptly submit complaints, ensuring they are lodged no later than 180 days from the date of the alleged discrimination.

How to File a Complaint

- **Web form** [Complaint/Grievance Form](#)
- **Email** cityclerk@manitouspringsco.gov
- **Phone** 719-685-2554 (available Monday-Friday between the hours of 8:00 a.m. - 5:00 p.m. Mountain Time excluding observed Manitou Springs City holidays)
- **Mail** ADA Coordinator
606 Manitou Ave.
Manitou Springs, CO 80829

The following information is required to be submitted with a complaint:

- name of the person initiating the grievance
- address
- phone number
- program or location of the grievance
- date
- description of the problem.

Timeline for Complaints

- Within 15 days of receipt of a complaint, Manitou Springs will notify claimant of receipt of the complaint. Manitou will then initiate discussion with the claimant to draft an acceptable plan for resolution.
- Within 30 days of receipt of a complaint, Manitou Springs will have a resolution plan; or, if a resolution plan within 30 days is not possible, Manitou Springs will send claimant a written explanation that includes the additional amount of time needed.

Resolution plans will

- be in writing and signed by both Manitou Springs and the claimant
- specify corrective action to be taken and the time frame for the fix
- include accommodations offered during the stated time span for correction
- provide assurance that the discrimination will not reoccur.

Progress & Updates

The Digital Accessibility Transition Plan is a living document. The ADA Coordinator will review this transition plan at least yearly and on an as-needed basis. Examples of events that would require a review and update to this document include but are not limited to

- changes to the Complaint or Accessibility Request processes
- when a new individual or organization is made responsible for ADA Coordination tasks.

Updates to this document are to include reporting on the progress of remediation milestones and any changes to the processes described. This document will also be updated to reflect any changes to relevant laws, regulations, and standards.

Update History

Date	Version	Description	Approver
4/5/2024	1.0	Initial release	

4/16/2024	1.1	Updated milestone timelines and priority level dates on page 7 and 9, after City Council discussion.	
4/16/2024	1.1	Formal adoption by City Council	

Glossary of Terms

- **Active use** Active use is the same as defined in Rules Establishing Technology Accessibility Standards, 8 CCR 1501, section 11.4.
- **ADA Coordinator** An individual designated to coordinate and implement ADA compliance activities.
- **Archived web content** Web content that meets all three of the following criteria:
 - maintained exclusively for reference, research, or recordkeeping
 - not altered or updated after the date of archiving
 - organized and stored in a dedicated area or areas clearly identified as being archived.
- **Digital content** Information or data that is produced and supplied in digital form including but not limited to web sites, videos, and electronic documents.
- **Reasonable accommodation** Reasonable accommodation is the same as defined in Rules Establishing Technology Accessibility Standards, 8 CCR 1501, section 11.4.
- **Reasonable modification** Reasonable modification is the same as defined in Rules Establishing Technology Accessibility Standards, 8 CCR 1501, section 11.4.
- **Undue burden** Undue burden is the same as defined in Rules Establishing Technology Accessibility Standards, 8 CCR 1501, section 11.4.

Resources

- [U.S. Department of Health and Human Services Section 504 Fact Sheet](#)

- [Americans with Disabilities Act Title II](#)
- [Colorado HB 21-1110](#)
- [Web Content Accessibility Guidelines \(WCAG\) 2.1](#)
- [Colorado Governor's Office of Information Technology Rules Establishing Technology Accessibility Standards, 8 CCR 1501-11](#)
- [Standard Operating Guide for Procuring Accessible Technology for the State of Colorado](#)
- [Colorado IT Accessibility Planning Template](#)