

Digital Accessibility Plan

Created by Nelnet Government Services, Nelnet, Inc.,
for the Town of Parker, Colorado

Abstract

This document was created for the Town of Parker to use to comply with Federal and State Accessibility requirements. Once the document is approved by the Town of Parker and the cover page is removed, the document becomes the property of Parker to execute on the plan.

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Nelnet Government Services



Digital Accessibility Plan

Town of Parker, Colorado

Introduction

The Town of Parker is committed to providing digital content and services that are accessible to the widest possible audience, regardless of technology or ability. Our goal is to deliver an online experience that achieves compliance with the Web Content Accessibility Guidelines (“WCAG”) 2.1 AA Standards that are published by the World Wide Web Consortium, or such other accessibility standards as are adopted by rules issued by the Colorado Office of Information Technology from time to time (the “Accessibility Standards”).

The following accessibility plan assists with a long-term strategic approach to continue improvements to the accessibility of the Town’s digital content and services. This plan summarizes the Town’s web-accessibility evaluation, transition plan, and ongoing management plan, including:

1. An overview of the State of Colorado’s accessibility requirements, as set forth in C.R.S. §24-85-103 and its accompanying regulations;
2. Identification of internal and customer-facing applications and portable document types that may create barriers to online accessibility;
3. An overview of the Town’s accessibility policy;
4. Evaluation and prioritization methods of the Town’s applications and content; and
5. Milestones to achieve compliance with the Accessibility Standards.

Summary of the Colorado Accessibility Standards

On June 30, 2021, Governor Jared Polis signed HB 21-1110 into law, which is now codified at C.R.S. §24-85-103 (the “Act”). This legislation requires that information technology systems used by governmental entities, including content hosted on those systems, is accessible for people with disabilities. This is intended to ensure that people with disabilities are afforded the same ability to enjoy and participate in the services, programs, and activities offered by public entities.

The Act therefore requires IT systems used by governmental entities to comply with the WCAG 2.1 AA Standards beginning on July 1, 2024, and applies to both internal and external-facing systems. From time to time, the State's Office of Information Technology ("OIT") may update the Accessibility Standards. The Town will therefore need to stay up to date on the applicable standards and adjust its accessibility strategies accordingly.

The Town of Parker's Online Accessibility Policy

The Town's policy has been developed to promote equal access to the programs, services, and activities provided through the Town to individuals with disabilities. This policy applies to all digital products and services, including websites, mobile applications, software, subscription services, electronic communications, and digital documents such as PDFs (collectively, "digital assets").

Policy Statement

- a) Content that is in active use, is new, or that has been redesigned and is published on the Town's digital assets after the effective date of this policy will conform to the Accessibility Standards, unless an exception applies, as set forth in this policy.
- b) Existing content will either be archived or modified to conform to the Accessibility Standards. Content hosted on public digital assets will be evaluated, prioritized, and scheduled for remediation.
- c) No particular technology or design approach is required. The aim is to maximize access to and use of the Town's digital assets by individuals with disabilities.

Roles and Responsibilities

- a) Accessibility Coordinator

Note: The responsibilities of the Accessibility Coordinator are currently managed by existing employees in the Town Manager's Office. Depending on budget availability the Town may explore hiring a third party to assist with remediation and additional audits and/or a full-time employee to fill this position, which would allow greater capacity to perform accessibility training and remediation duties.

- Attend accessibility training provided by the Town's accessibility vendor.
- Stay current on laws, rules, and regulations governing digital accessibility.
- Manage requests to remediate inaccessible digital assets and to provide alternative access if remediation is not possible or practicable.
- Track the Town's progress in achieving compliance with the Accessibility Standards.
- Manage the Town's efforts to comply with this policy, including making meaningful progress towards achieving compliance with the Accessibility Standards.

- Audit the Town’s digital assets on a scheduled basis to ensure compliance with the Accessibility Standards.
- Ensure all newly created or procured digital assets meet or exceed the Accessibility Standards prior to implementation or publication.
- Evaluate current and emerging tools and technologies to provide equal access.
- Analyze potential barriers to accessibility and remediate them based on a use and risk-based priority model.
- Create and update policies, procedures, how-to guides, training, and expectations that are accurate and meet the Accessibility Standards.
- Review potential and implemented legislative and policy changes on a scheduled basis to update the Town’s plans, policies, procedures, documentation, and training.
- Find ways to incorporate accessibility as a quality and innovation driver.
- Manage the Town’s implementation of its Accessibility Plan.
- Provide updated tools, techniques, and instructions to Town staff, contractors, and vendors.

b) IT Department

- Attend accessibility training provided by the Town’s accessibility vendor.
- Select and implement tools that conform to this policy.
- Provide tools to support automated accessibility testing.

c) Town Content Creators

- Attend appropriate and regular accessibility training as provided by the Town’s accessibility vendor.
- Fix accessibility issues identified by staff and members of the public.
- Identify inaccessible online content and remediate.
- Create graphics that are compliant with this policy.
- Fix accessibility issues identified by staff and members of the public.

d) Leadership (Department Directors/Town Manager’s Office)

- Attend appropriate and regular accessibility training as provided by the Town’s accessibility vendor.
- Ensure departments comply with this policy.

e) Authors of Documents

- Attend appropriate and regular accessibility training as provided by the Town’s accessibility vendor.
- Comply with this policy.

f) Staff

- Attend appropriate and regular accessibility training as provided by the Town’s accessibility vendor.
- Comply with this policy.

Special Rules for Archived or Unique Content

- a) Content that has been archived from public-facing digital assets shall be stored on a non-public server and shall be made available upon request. If the Town receives a request for archived content, the Town shall render such content compliant with the Accessibility Standards prior to transfer to the requestor.
- b) Certain unique documents may take longer to come into compliance with the Accessibility Standards but are not appropriate for archival. Instead, the following types of content will include the following disclaimer:
 - *[Short summary of the document]. Upon request, the Town will provide reasonable accommodations for alternative access to the document(s) listed above. To receive alternative access, please submit a request here (hyperlink).*
- c) The request for alternative access shall be sent to the Accessibility Coordinator, who shall ensure that the request is forwarded to the appropriate department. Alternatively, the Accessibility Coordinator may directly work with the requestor to provide alternative access to the content.
- d) The Town may provide alternative access to digital assets. This may include providing different formats of information, alternative communication methods, or accessible technology solutions.
- e) Types of content that may be subject to the alternate access procedure described above include, but are not limited to:
 - Blueprints
 - Architectural drawings
 - Diagrams displaying information that is also provided in narrative text.
 - Complex and/or atypical images, diagrams, and documents
 - Scanned historical publications.
 - Handwritten correspondence
 - Technical drawings
 - Site plans, development plans, and maps
 - Complex and comprehensive tables and charts
 - Documents or content types identified as having no or low impact on users of assistive technology, or content that contains information that is already available in an alternative accessible format.
 - Any image for which there is no logical methodology to create an alternate description that will make the image understandable to assistive technology.

Notification of Inaccessibility Procedure

If an individual discovers that any of the Town's digital assets do not meet the Accessibility Standards, they may report the inaccessible digital asset by using the accommodation request form on the Town website's [Accessibility page](#), emailing

communications@parkerco.gov or calling Town Hall at 303-841-0353. The following information should be included:

- a) Name of the individual submitting the report
- b) Name of the individual who encountered the inaccessible content, if different from the individual submitting the report
- c) Email address
- d) Phone Number
- e) Program, content, or location of the inaccessible digital asset.
- f) Date of the report
- g) Date of issue being reported.
- h) Description of the problem

Within 14 calendar days after receipt of the report, the Accessibility Coordinator or their designee will contact the individual to discuss the problem and possible resolutions. Within 30 calendar days of that discussion, the Town will a) provide the digital asset in an accessible format or update the technology to comply with the Accessibility Standards; b) provide the individual with a reasonable accommodation to afford them reasonable access; or c) notify the individual that the Town cannot fulfill the request because it would constitute an undue burden, fundamental alteration, or direct threat and explain its reasoning in compliance with 8 CCR 1501-11.10.

If the issue is not satisfactorily resolved, the individual who issued the report may appeal the decision within 30 calendar days after receipt of the Town's response to the Town Manager.

Training Requirements

Training is an initial investment that pays off as understanding of accessibility increases and it becomes more common practice. Increased knowledge should result in more accessible implementations the first-time content is created, helping to reduce evaluation and rework costs, and to limit risk.

Online learning will be available for general staff to take during onboarding as initial training and periodically as regular training.

- 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 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.
- Compliance training
 - All employees who create/edit digital content and their supervisors will receive initial training in the Act's legal requirements and accompanying regulations. After initial training is complete, employees should periodically receive regular training.

Testing Tools and Techniques

The Town will incorporate a variety of tools, techniques, methods, and processes to identify accessibility barriers and meet existing and new assistive technology needs. Content creators will use testing checklists incorporating automated accessibility testing suites, manual inspection tools, and manual testing using keyboards and assistive technology such as screen readers in order to ensure accessibility before publishing content.

Milestones

Remediation and Compliance Efforts

Remediation and compliance will be conducted in three phases: assessments, analysis and prioritization, and remediation.

Phase 1: Assessments

The Town has hired a consultant to conduct accessibility assessments of its digital assets, whether accessed by the public, internal staff, or both. This assessment only includes technology managed, created, or directed by the Town.

Phase 2: Analysis and Prioritization

Upon completion of the initial assessment, the Town will work on conducting a full inventory of its digital assets and, in conjunction with the consultant, will evaluate the results to prioritize the order in which digital assets should be made accessible. The consultant shall meet with the Town's departments to discuss the size, complexity, usage, and criticality of technology identified as needing remediation to analyze the scope of the remediation needs. In determining which digital assets to prioritize, the Town and consultant should consider the following factors:

- Is the digital asset public or internal only?
 - **For public access:**

- The number of external users. This includes counts of people who access each digital asset included in the inventory.
 - The number of internal users. This includes counts of people who access each digital product included in the inventory.
- **For internal access:** the number of internal users. This includes counts of people who access each digital product included in the inventory.
- Frequency of access by user types, for example, daily, weekly, monthly, quarterly, semiannually, annually, biannually, less frequently, once, etc.
- Was the digital asset procured or created in-house?
 - **Procured or vendor solutions:** is the product custom, commercial-off-the-shelf (“COTS”), software-as-a-service (“SaaS”), or a hybrid?
 - **Example 1:** Although we use Microsoft Office and Adobe Acrobat products to produce content and share or collect information, the Microsoft and Adobe outputs would be considered custom because we have control of how the content is created and delivered.
- For vendor solutions:
 - How much control does the Town have to access all parts of the product and perform testing and remediation, and how much would be required of the vendor, or a third party, to test and remediate?
 - What is the vendor’s understanding of Colorado’s digital accessibility requirements and what is their compliance appetite and estimated timeline?
 - When does the current contract and all renewals expire or when will a new procurement cycle need to begin?
 - Did the vendor provide, or are they willing to provide, an Accessibility Conformance Report (ACR)?

Phase 3: Remediation

Using the tools recommended by the consultant, the Town will begin remediating its digital assets to meet the Accessibility Standards in accordance with the prioritization determined in Phase 2. Individual web pages and documents will be prioritized for remediation using the following criteria:

- High – this includes the top 25% of highest-trafficked pages, as well as pages and documents used for accessing essential city services, programs, or activities. Additionally, any content for which the Town 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.

The Town will work with the consultant to determine a remediation timeline that best fits the Town’s budget and strategic goals.

Remediation and Compliance Efforts Status

Digital Asset Inventory

The Digital Asset Inventory is maintained separately in Appendix A. The status of individual inventory items will be updated regularly as assessments and remediations are performed.

Accessibility Assessment Results

In partnership with the Town, the Town’s accessibility vendor, Nelnet Government Services, conducted an accessibility assessment of websites, applications, and digital documents. Utilizing WCAG Website Accessibility Conformance Evaluation Methodology (WCAG-EM), a representative sample was selected from each of the prioritized web products. These samples were audited to test conformance with WCAG 2.2 Level AA, using a combination of automated and manual testing processes, including testing with assistive technology.

A summary of the testing performed, and results are provided in the following table. Each digital asset is listed in individual rows. The second column describes the representative sample used for testing, and the third column of each row shows the potential barriers identified for that digital asset.

Product	Audited content	Potential barriers identified
Town of Parker Website (Web Content)	<ol style="list-style-type: none"> 1. Parker CO Home Page 2. Youth Commission 3. Performance Measure Dashboard 4. Form Center: Open Records Request 5. News Flash: 24 in ‘24 Challenge. 6. FAQs 7. Community Events 	Total – 70 <ul style="list-style-type: none"> • High – 15 • Medium – 27 • Low – 28
Town of Parker Website (Documents)	<ol style="list-style-type: none"> 1. Budget Book 2. Talk of the Town Newsletter 3. 2023 Annual Report 4. 2035 Master Plan 5. Bike and Pedestrian Master Plan 6. Zoning Map 7. Strategic Plan 	Total – 46 <ul style="list-style-type: none"> • High – 22 • Medium – 11 • Low – 13

Product	Audited content	Potential barriers identified
Parker Recreation (Web Content)	<ol style="list-style-type: none"> 1. Parker Rec Home Page 2. H2O O'Brien Pool 3. Activity Guide 4. Park and Field Rentals 5. Park Amenities 6. O'Brian Park 7. Youth Sports 8. Calendar 	Total – 59 <ul style="list-style-type: none"> • High - 19 • Medium - 30 • Low – 10
Parker Recreation (Documents)	<ol style="list-style-type: none"> 1. Sports Handbook 2. Recommended Plant List 3. Parks and Trails Map 4. Pool Schedule 5. Volunteer Waiver 6. Recreation Activity Brochure 	Total – 59 <ul style="list-style-type: none"> • High – 19 • Medium – 30 • Low – 10
Parker Police (Web Content)	<ol style="list-style-type: none"> 1. Home Page 2. Alert Center 3. Form Center: Parker Police Interested Card 4. Government Transparency 5. Directory 6. Citizen's Police Academy Program 7. Notify Me 8. Identify Theft/Fraud/Financial Crimes Web Form 9. Lost Property Web Form 	Total – 72 <ul style="list-style-type: none"> • High – 21 • Medium – 36 • Low – 15
Parker Police (Documents)	<ol style="list-style-type: none"> 1. Citizen Satisfaction Survey 2. Citizen Satisfaction Survey Issue 3. Monthly Reports – March 4. Records Request Form (Fillable version) 5. Records Request Form (Print, Fill, Email version) 	Total – 22 <ul style="list-style-type: none"> • High – 12 • Medium – 6 • Low – 4
Parker Arts (Web Content)	<ol style="list-style-type: none"> 1. Home Page 2. Shows and Events 3. Weddings 4. Artist Page 5. Contact Us 6. Shows and Events Individual Page – Legally Blonde 7. Donate page 	Total – 47 <ul style="list-style-type: none"> • High – 17 • Medium – 19 • Low – 11

Product	Audited content	Potential barriers identified
Parker Arts (Documents)	<ol style="list-style-type: none"> 1. Pace Center Technical Package 2. Summer Rec Brochure 3. Membership Benefits Table 4. Cultural and Scientific Commission Meeting Minutes 	Total – 17 <ul style="list-style-type: none"> • High – 9 • Medium – 6 • Low – 2
Let's Talk Parker	<ol style="list-style-type: none"> 1. Let's Talk Parker Home Page 2. Registration 3. Fact or Fiction 4. My Mainstreet 5. Police Traffic Enforcement Map 	Total – 28 <ul style="list-style-type: none"> • High -7 • Medium – 14 • Low – 7
P3 (Web Content)	<ol style="list-style-type: none"> 1. P3 Home Page 2. Facade and Landscape Improvement Plan 3. Interactive Urban Renewal Plan Areas Map 4. Who we are (pdf reader) 5. Parker Economic Development Data and Cost 6. Capital Improvement Projects 	Total – 47 <ul style="list-style-type: none"> • High – 16 • Medium – 15 • Low – 16
P3 (Documents)	<ol style="list-style-type: none"> 1. P3 Brochure 	Total – 3 <ul style="list-style-type: none"> • High – 3

Documents

Assessment

The Town will perform an assessment of its digital documents to determine which documents are in active use, and will incorporate checklists to ensure that barriers are removed from all active use documents.

Guidelines

The Town, in conjunction with the consultant, will create guidelines and workflows to be posted on the Town's intranet that will guide staff in how to create online content that meets the Accessibility Standards. These guidelines will be applied to all newly created or updated documents.

External Applications

The IT Department will reach out to the points of contact for all platforms and digital assets provided by external vendors to notify them of the Accessibility Standards. Where possible, agreements with the vendors will be amended to include a requirement that the technology meets the Accessibility Standards. All new digital assets provided by external vendors must include a contract clause requiring compliance with the Accessibility Standards.

If a vendor cannot or will not agree to comply with the Accessibility Standards, the Town will evaluate if an alternative product that complies with the Accessibility Standards can be used.

Procurement & Current Digital Assets

Policy for Procurement of Digital Assets

Purpose: As of July 1, 2024, all Colorado governmental entities must ensure that their digital assets are accessible to individuals with disabilities. This policy aligns with the statutory requirements by requiring the procurement of digital assets that meet the Accessibility Standards.

Scope: This policy applies to all digital assets purchased by or contracted for by the Town of Parker, including, but not limited to, websites, web applications, mobile applications, software as a service, and software.

Policy Statement: The Town of Parker shall procure digital assets that meet the Accessibility Standards to ensure that all users, including those with disabilities, have equal access to digital services.

Requirements:

- **Procurement Documents:** All procurement documents for digital assets must include requirements for the Accessibility Standards. This includes specifying the level of compliance required and referencing the relevant Accessibility Standards that have been adopted by the Colorado Office of Information Technology.
- **Evaluation of Vendors:** The Town shall evaluate potential vendors for their expertise in accessibility, including reviewing their accessibility policies, practices, and experience working on accessible projects.
- **Accessibility Testing:** Potential vendors shall be required to conduct accessibility testing on their digital assets to ensure that they meet the Accessibility Standards. This testing should include both automated and manual testing.

- **Solicitation and Contract Language:** The solicitation documents and the contract with the vendor shall include specific language for Accessibility Standard compliance, including a statement that the vendor is responsible for ensuring the digital assets meet those requirements during the term of the contract and any renewals.
- **Implementation:** The Town shall ensure that all staff involved in the procurement of digital assets are aware of this policy and its requirements. This policy shall be incorporated into all relevant procurement procedures and guidelines.
- **Enforcement:** The Town shall enforce this policy through regular monitoring of compliance and by taking appropriate action, including withholding payment or terminating the contract, in the event of non-compliance.

Policy for Outside Consultants Providing Compliant Documents

Purpose: The purpose of this policy is to encourage the Town's outside consultants to ensure that all documents provided to the Town are accessible to all users, including individuals with disabilities. To achieve this goal, outside consultants providing services to the Town that involve the production of documents/deliverables are encouraged to comply with the Accessibility Standards.

Scope: This policy applies to all outside consultants providing services to the Town which involve the production of documents/deliverables.

Policy:

1. **Compliance with Accessibility Standards:** All outside consultants providing documents to the Town, or creating web-based content, such as a webpage or content for a website or application, are encouraged to comply with the Accessibility Standards.
2. **Review:** The Town will review all documents/deliverables provided by consultants for compliance with the Accessibility Standards.
3. **Contract Requirements:** All contracts between the Town and consultants must include language requiring compliance with this policy. The contract shall specify that all documents/deliverables provided by the consultant are encouraged to comply with the Accessibility Standards.

Continuous Monitoring and Improvement

Digital accessibility for individuals with disabilities will never be complete. Changes in technology, legislation, policies, procedures, best practices, and content will always drive the need for continuous monitoring, modifications, and improvements.

Periodically, the Town will conduct a high-level assessment of its overall accessibility maturity to evaluate the current effectiveness and capabilities of its accessibility practices and identify where further improvements can be made to remove barriers.

Accessibility maturity stages loosely correspond to the following criteria:

Stage	Criteria
Inactive	No awareness and recognition of need. At this stage organizations are inventorying their technology, have begun to make investments, etc.
Launch	Recognized need organization wide. Planning initiated, but activities not well organized.
Integrate	Roadmap including timeline is in place, overall organizational approach defined and well organized.
Optimize	Incorporated into the whole organization, consistently evaluated, and actions taken on assessment outcomes.

Accessibility Maturity History

Date	Stage	Why we are at this stage
June 2024 (Current)	Launch	<p>The Town has made substantial efforts toward identifying accessibility barriers and developing accessibility policies including:</p> <ul style="list-style-type: none"> • Publishing this Digital Accessibility Plan • Performing accessibility assessments to identify current barriers. • Reaching out to vendors to address accessibility issues in external applications. • Training <p>More work is needed to remove accessibility barriers and maintain accessibility into the future, including:</p> <ul style="list-style-type: none"> • Hiring a dedicated Accessibility Coordinator • Remediating identified accessibility barriers. • Establishing an ongoing accessibility training program • Establishing accessibility guidelines for publishing digital content

Progress and Updates

The Digital Accessibility Plan is a living document. The Accessibility Coordinator will review this accessibility 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 Accessibility 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
6/28/2024	1.0	Initial release	

Glossary

- **Active use** - Active use is the same as defined in Rules Establishing Technology Accessibility Standards, 8 CCR 1501, section 11.4.
- **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 asset** - all digital products and services, including websites, mobile applications, software, subscription services, electronic communications, and digital documents such as PDFs. Digital assets include, but are not limited to, the following:
 - Included Technology:
 - Software Applications
 - Emails

- Documents
- Videos
- Audio
- Kiosks
- Digital Signage
- Hardware
- Third-Party Tools
- Websites
- Included Content
 - Text
 - Images
 - Links
 - Forms
 - PDFs
 - Documents
 - Spreadsheets
 - Reports
 - Videos
 - Audio
 - Social Media Posts
 - Embedded Third-Party Content
- **Undue burden** Undue burden is the same as defined in Rules Establishing Technology Accessibility Standards, 8 CCR 1501, section 11.4.
- **Web Content Accessibility Guidelines (WCAG)** – Guidelines developed through the W3C process in cooperation with individuals and organizations around the world, with a goal of providing a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally.

- **Website Accessibility Conformance Evaluation Methodology (WCAG-EM)** – An approach for determining how well a website conforms to Web Content Accessibility Guidelines (WCAG).
- **World Wide Web Consortium (W3C)** – An international community where member organizations, a full-time staff, and the public work together to develop web standards.

Resources

- [Accessibility Conformance Report \(ACR\)](#)
- [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](#)