

City of Thornton Digital Accessibility Plan

July 1, 2025

Introduction:

In 2021, Colorado Governor Jared Polis signed into law House Bill 21-1110, which amended existing Colorado statutes to strengthen protections for persons with disabilities against discrimination (the “Digital Accessibility Law”). Among other things, the Digital Accessibility Law ensures that persons with disabilities are not excluded from participation in or denied the benefits of services, programs, or activities provided by a public entity, specifically with respect to digital content such as websites, applications, electronic records, and other online resources.

The Digital Accessibility Law requires all State agencies and local governments to fully comply with State-established accessibility standards on or before July 1, 2024. The City of Thornton (“City”) is committed to digital accessibility for all citizens, and in accordance with its obligations under the Digital Accessibility Law and Federal non-discrimination statutes like the Americans with Disabilities Act (“ADA”) and Section 504 of the Rehabilitation Act (“Section 504”), has prepared this Digital Accessibility Plan (“Plan”) to guide these efforts.

Purpose of Plan:

The purpose of this Plan is to provide formal guidelines, goals, and timelines related to the City’s efforts to improve digital accessibility throughout the City in accordance and in compliance with the Digital Accessibility Law. The Plan will serve as a means of formal documentation of the procedures and progress of compliance. The Plan will also be incorporated into the City’s overall ADA Transition Plan, which is updated annually. The City is committed to making its websites and digital content accessible to everyone, including individuals with disabilities.

Definitions:

Active Use - shall have the same meaning as set forth in the OIT Rules, as amended, and for public-facing ICT means ICT that is currently used by members of the public as a primary means to apply for, gain access to, or participate in a public entity's services, programs, or activities. For internal-facing ICT, active use means ICT currently used by employees to perform their job duties. ICT in active use includes the authorized, official version or versions. ICT in active use does not include previous versions that may still be available, archived content, archivist materials, working products, deliberative materials, or drafts.

ADA – the “Americans with Disabilities Act,” a federal law that prohibits discrimination against persons with disabilities in several areas, including employment, transportation, public accommodations, communications, and access to state and local government’s programs and services.

ADA Coordinator - an individual designated by the City Manager who coordinates and implements overall ADA compliance activities, plans, and programs, and updates the City’s ADA Transition Plan on an annual basis.

Assistive Technology (AT) - any item, piece of equipment, software program, or product system that is used to increase, maintain, or improve the functional capabilities of persons with disabilities.

CADA –the “Colorado Anti-Discrimination Act,” C.R.S. 24-34-301 *et seq.*, a state anti-discrimination law that, among other things, protects employees from discrimination and harassment based on their membership in a protected class, and prohibits retaliation. Protected classes include, but are not limited to, disability, race, creed, color, sex, sexual orientation, gender identity, gender expression, marital status, religion, age, national origin, and ancestry.

C.R.S. – the Colorado Revised Statutes.

Department of Justice (DOJ) - a Federal department empowered to handle all criminal prosecutions and civil suits in which the United States had an interest.

Digital Accessibility - refers to the practice of designing and developing digital content, such as websites, applications, documents, and multimedia, in a way that ensures equal access and usability for all individuals, including those with disabilities. The goal of digital accessibility is to eliminate barriers that may prevent people with disabilities from fully interacting with and benefiting from information and services available through digital means. Examples of disabilities that digital accessibility aims to address include visual impairments, hearing impairments, mobility impairments, cognitive impairments, and more.

Direct Threat - a significant risk to the health or safety of others that cannot be eliminated by a modification of policies, practices or procedures, or by the provision of auxiliary aids or services.

Fundamental Alteration - a change in the essential nature of the entity’s program, service, or activity.

Information and Communication Technology (ICT) – Information technology and other equipment, systems, technologies, or processes, for which the principal function is the creation, manipulation, storage, display, receipt, or transmission of electronic data and

information, as well as any associated content. Examples of ICT include but are not limited to: computers and peripheral equipment; information kiosks and transaction machines; telecommunications equipment; customer premises equipment; multifunction office machines; software; applications; web sites; videos; and, electronic documents. The term does not include any equipment that contains embedded information technology that is used as an integral part of the product, but the principal function of which is not the acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. However, if the embedded information technology has an externally available web or computer interface, that interface is considered ICT. For example, Heating, Ventilation, and Air Conditioning (HVAC) equipment such as thermostats or temperature control devices, and medical equipment where information technology is integral to its operation are not considered information technology.

Office of Information Technology (OIT) – The Digital Accessibility Law places responsibility for compliance with the Governor’s Office of Information Technology accessibility standards on both digital and online platform providers and content owners.

OIT Rules – final Rules Establishing Technology Accessibility Standards, 8 CCR 1501-11, published by the OIT in accordance with and authorized by C.R.S. 24-37.5-106(4) & 24-85-103, as may be amended.

Rehabilitation Act - Federal law that prohibits discrimination on the basis of disability in programs conducted by Federal agencies, in programs receiving Federal financial assistance, in Federal employment, and in the employment practices of Federal contractors.

Remediate or Remediation - modify or replace digital content such that the content is in full compliance with WCAG 2.1 Level AA or any other State-mandated accessibility standard, or otherwise accessible to persons with disabilities.

Undue Burden - as it pertains to public-facing ICT, refers to the standard as construed by C.R.S. § 24-34-601, *et seq.*, C.R.S. § 24-34-802, Title II of the Americans with Disabilities Act, and Section 508 of the Rehabilitation Act, and the related conforming and implementing regulations.

Web Content Accessibility Guidelines (WCAG) - guidelines developed 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.

WCAG 2.0 – the Web Content Accessibility Guidelines published in December 2008.

WCAG 2.1 – amended Web Content Accessibility Guidelines that cover a wide range of recommendations for making Web content more accessible. These guidelines make content more accessible to a wider range of people with disabilities, including accommodations for blindness and low vision, deafness and hearing loss, limited movement, speech disabilities, photosensitivity, and combinations of these, and some accommodation for learning disabilities and cognitive limitations. These guidelines define three levels of conformance: Level A, Level AA, and Level AAA.

Web Content – website pages and digital documents intended for public use.

Website Accessibility Conformance Evaluation Methodology (WCAG-EM) - an approach for determining how well a website conforms to WCAG.

Roles and Responsibilities:

ADA Coordinator – With respect to this Plan, generally oversees the City’s efforts to improve digital accessibility throughout the City in accordance and in compliance with the Digital Accessibility Law. The ADA Coordinator, in consultation with the City’s Information Technology (IT) division, Communication Department, Technology Accessibility Committee, content creators, and Digital Accessibility Specialist, shall be responsible for implementation of this Plan.

Digital Accessibility Advisers - Serve as the subject matter experts for technology, communication, and accessibility related matters specific to this Plan and includes representatives from the City’s IT and Communication Departments.

Technology Accessibility Committee – Serves as the steering committee to assist, direct, and support this Plan and ongoing digital accessibility needs and includes representatives from the City Manager’s Office, IT, Communications, Risk Management, Contracts, and the City Attorney’s Office.

Digital Accessibility Specialist – Primary City contact responsible for creating procedures for regularly testing and remediating ICT, assisting departments with prioritizing ICT in active use, and creating policies and practices within departments to ensure long term digital accessibility compliance.

Communications and Support Process:

Community feedback on digital accessibility issues is critical to ensuring that this Plan is successfully implemented. The City is committed to updating this Plan and its approach to compliance with the Digital Accessibility Law, based on real world, user experiences with the City’s digital content.

Members of the public and City employees are encouraged to submit questions, concerns, complaints, and other feedback on this Plan to the City's ADA Coordinator by phone at 303-538-7334 or by [emailing the ADA Coordinator](#). The digital accessibility advisers or specialist will respond to any accessibility issues that are reported by [emailing the Digital Accessibility Specialist](#) inbox or via a phone call to 303-538-7334. The City will address identified issues in a timely manner and, if appropriate, will consult with the Digital Accessibility Specialist or the Technology Accessibility Committee to resolve accessibility concerns.

Pursuant to the OIT Rules, the City published a technology accessibility statement on the City's website identifying its commitment to ensuring that its website and other ICT are accessible to everyone, including individuals with disabilities. The technology accessibility statement includes information on how to request reasonable accommodations or modifications and how to report inaccessible ICT.

Current Laws that Govern the Plan:

State Requirements:

Compliance with the Digital Accessibility Law¹ is the primary focus of this Plan. The Digital Accessibility Law amended Part 8 of CADA to include the following new requirements and standards applicable to the City:

- An individual with a disability, as defined in C.R.S. § 24-34-301, must not, by reason of the individual's disability, be excluded from participation in or be denied the benefits of services, programs, or activities provided by a public entity or be subjected to discrimination by any such public entity.
- Discrimination now includes the failure of a public entity to fully comply, on or before July 1, 2024, with the accessibility standards for individuals with a disability established by the OIT (i.e., the OIT Rules). Liability for noncompliance as to content lies with the public entity that manages the content, and liability for noncompliance of the platform hosting the content lies with the public entity that manages the platform.

Pursuant to the Digital Accessibility Law's requirement that the Chief Information Officer in the OIT create rules establishing accessibility standards for individuals with a disability based on and including, but not limited to, the most recent WCAG standards, the OIT published the OIT Rules on May 9, 2025.

¹ The Digital Accessibility Law is codified in Sections 24-34-301 & -802, 24-85-101, and 24-85-102 through -104 of the Colorado Revised Statutes.

Noncompliance with the Digital Accessibility Law may result in any of the following:

- A court order requiring the governmental entity to comply with the pertinent statute;
- The recovery of actual monetary damages;
- A \$3,500 fine per violation;
- An award of attorney's fees.

Federal Requirements:

The Americans with Disabilities Act (ADA) is a federal civil rights law that prohibits discrimination against persons with disabilities in all areas of public life including employment, government programs, and services, transportation, and places open to the public. Title II of the ADA requires public entities, such as the City, to complete a self-evaluation and develop a transition plan to address any barriers persons with disabilities may encounter in City programs, services, activities, and facilities, including those the City makes available digitally.

As a recipient of Federal funds, the City is subject to the requirements of Section 504 of the Rehabilitation Act (Section 504), a Federal law that protects individuals with disabilities from discrimination. Like the ADA, Section 504 prohibits organizations and employers from excluding or denying individuals with disabilities an equal opportunity to receive program benefits and services, including those that are provided digitally.

Background of Remediation Compliance:

In 2021, the City began evaluating its public-facing and internal-facing web applications and related ICT. In addition, the City developed a Technology Accessibility Committee to spearhead efforts to comply with Digital Accessibility Law. The Designated Technology Accessibility Advisers were identified within departments and divisions, and these contacts will work with the Communications and IT Departments to lead the City's efforts related to auditing, remediation, and overall compliance with the Digital Accessibility Law. Evaluations incorporated WCAG 2.1's web accessibility standards and WCAG-EM. The following WCAG 2.1 core principles were used to evaluate the accessibility of the City's technology:

- Perceivable - Information and user interface components must be presentable to users in ways they can perceive. This means that users must be able to perceive the information, and it must be visible in at least one accessibility form for the user.

- Operable - User interface components and navigation must be operable. This means that users must be able to operate the interface (the interface cannot require interaction that a user cannot perform).
- Understandable - Information and the operation of the user interface must be understandable. This means that users must be able to understand the information as well as the operation of the user interface (the content or operation cannot be beyond their understanding).
- Robust - Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies. This means that users must be able to access the content as technologies advance (as technologies and user agents evolve, the content should remain accessible).

Current Existing Testing Tools and Techniques Utilized by the City:

The City utilizes various systems and programs to assist with identifying accessibility barriers and to meet existing and new assistive technology needs. The following tools and techniques are not intended to represent an inclusive list, but a shortlist of tools and processes that the City currently utilizes in its accessibility compliance initiatives:

- Siteimprove - The City uses [Siteimprove](#) to audit its main website, ThorntonCO.gov. Siteimprove is a web-based tool that crawls websites and reports back on quality assurance issues, such as broken links and misspellings, including accessibility issues measured by the WCAG. The City's web authors use the findings of the scan to fix accessibility issues that are protected under the WCAG.
- Internet Browsers - To ensure consideration is given to as many devices and browser types as possible, manual accessibility tests are conducted incorporating a variety of browsers, including the latest versions of Internet Explorer, Edge, Chrome, and Firefox, with a minimum of six assistive technology types, which can include, but are not limited to: WAVE, Colour Contrast Analyzer, JAWS, NVDA, VoiceOver, and ChromeVox.
- WAVE - WAVE is a code-sniffing application that assesses the accessibility of code, including HTML, CSS, and JavaScript documents, and provides guidance and techniques to remediate accessibility issues. WAVE can be accessed using the form at <https://wave.webaim.org/> or can be downloaded as a plug in for Firefox and Chrome.

- Colour Contrast Analyzer - The Colour Contrast Analyzer is a tool that is used to test color contrast accessibility. The tool includes a color-blind simulator and tests for WCAG 2.1 Levels A, AA, AAA, regular font and large font requirements.
- Screen Reader Technology - A “screen reader” is a program that enables a visually impaired user to read the text that is displayed on the computer screen with a speech synthesizer or braille display. Examples include JAWS, NVDA, Window Eyez, and Voiceover.
- NVDA (Screen Reader) - NVDA is a free, open-source, portable screen reader for Microsoft Windows. NVDA uses eSpeak as its integrated speech synthesizer. Output to braille displays is supported officially from version 0.6p3 onwards. NVDA works with software such as WordPad, Notepad, Internet Explorer, Chrome, Outlook Express, Mozilla, and other Microsoft-supported applications. NVDA is a popular tool and offers many features that are convenient for quality assurance testing professionals.
- VoiceOver (Screen Reader) - VoiceOver is a screen reader built into Apple Inc.’s macOS, iOS, tvOS, watchOS, and iPod operating systems. By using VoiceOver, the user can access their Macintosh or iOS device based on spoken descriptions and, in the case of Mac, the keyboard. The feature is designed to increase accessibility for blind and low-vision users, as well as for users with dyslexia. The tool can also be used to test mobile accessibility.
- ZoomText Magnifier/Reader - This is a fully integrated magnification and reading program tailored for low vision users. Magnifier/Reader enlarges and enhances everything on a computer screen, echoes user typing and essential program activity, and automatically reads documents, web pages, and email.
- Manual Evaluations - In addition to the automated testing tools described above, the City utilizes WCAG-EM and the success criteria of WCAG 2.0 Level AA to manually evaluate the City’s ICT.
- DocMD – Added to the City suite of accessibility-related software in 2024, this software reviews PDFs on the City’s website for compliance to the WCAG 2.1 AA standards. This tool is used by staff to track which documents on the website need to be updated and provides compliance reports for document accessibility.
- Remediate – Added to City’s suite of accessibility-related software in 2024, this software allows end users to edit and/or reformat documents to make them more accessible.

Plan for Remediation Compliance (Including Timeline):

The remediation plan will consist of different remediation practices depending on the type of ICT and responsible support entity. The remediation process has been broken into the following subsets: websites created and maintained by City employees, websites created and maintained by third parties, electronic documents, and other ICT.

Impact and Prioritization of ICT

The City will prioritize remediation of identified subsets based on impact to the public, as follows:

1. Websites created and maintained by City employees – A majority of services provided by the City are offered via City maintained websites. As such, public-facing websites were identified as being the most important remediation subset.
2. Electronic Documents – Pre-existing electronic documents in active use available to the public online are being prioritized second in the City's remediation efforts. Review and remediation, as appropriate, of all remaining electronic documents is a high priority because online documents tend to include information on how to request a service or a form to submit for services from the City. The City will continue to work towards ensuring that all newly created electronic documents are in compliance with the Digital Accessibility Law.
3. Websites created and maintained by third parties – The City uses vendors to provide certain important services for the public, including but not limited to, submitting applications for various permits, registering for recreation services, paying utility bills, etc. These services are vital to the public, but the City's ability to update this form of ICT is limited by current contractual obligations. The City is actively working with vendors to confirm their current accessibility guidelines and compliance and is responding accordingly. To the extent the City has control over the accessibility of ICT it contributes to these websites (i.e., social media posts), it will ensure that such ICT is in compliance with the Digital Accessibility Law.
4. Other ICT – Other ICT includes, for example, items like physical hardware such as kiosks and software assistance programs such as screen readers.

Timeline:

The following is a list of steps the City has taken to remove accessibility barriers in ICT with a timeline of those activities for compliance with WCAG 2.1 Level AA or other accessibility standard(s) required by the State:

- Established a Technology Accessibility Committee - an interdepartmental committee overseeing and guiding the City's digital accessibility compliance efforts, as further defined in the Digital Accessibility Transition Plan. The Technology Accessibility Committee meets monthly to plan and implement additional accessibility compliance efforts, as further defined in this Plan.
- Digital Accessibility Transition Plan – Created and posted to the City's website this Digital Accessibility Transition Plan that provides formal guidelines, goals, and timelines related to the City's efforts to improve digital accessibility throughout the City in accordance and in compliance with the digital accessibility law.
- Technology Accessibility Statement – In accordance with the OIT Rules, posted to the City's website a technology accessibility statement that, among other things, informs members of the public how to report inaccessible digital content and request a reasonable accommodation or modification.
- Thorntonco.Gov Hosting Migration – Migrated the City's thorntonco.gov main website to a host site that ensures compliance with the State's digital accessibility law.
- Thorntonco.Gov Documentation Website Audit – Completed a digital accessibility audit of the City's thorntonco.gov main website, removed outdated/inaccurate information, and began the process of remediating documents in active.
- Engaged a Remediation Vendor – The City selected a third-party vendor to assist with auditing documentation on City websites, providing digital accessibility compliance reports, and software to “remediate” documentation that was found to be inaccessible. The vendor will complete remediation when necessary and as directed by the City.
 - Update October 1, 2024 - The City initiated the process of completing the site review with the third-party vendor. The vendor shared their knowledge base resources with City staff.
 - Update January 1, 2025 – City staff met with the vendor and is in the process of configuring the auditing documentation on City website tool. City staff completed one training on the remediation software and is working to schedule an additional training in January of 2025.

- Update April 1, 2025 – City Staff has been trained on two remediation software programs and began working with using those to update existing documents.
- City-Wide Training Resources and Site Compliance Tool – The City has purchased and implemented a website auditing program to review websites and provide digital accessibility compliance information. This software also offers a variety of technical training for creating accessible content in a variety of programs (i.e. web content, Adobe, Microsoft Suite).
- City of Thornton Websites (non-thorntonco.gov domains) – Completed a feasibility study for transferring existing non-thorntonco.gov websites to the thorntonco.gov hosted site. Sites that can't be moved to the hosted site are being reviewed and updated so all digital content is accessible to individuals in the disability community. Websites that are moved to the new hosted thorntonco.gov site will be “remediated” during a transition project beginning July of 2024.
 - The review of these sites has been completed. A remediation plan has started. Some of these sites will be transferred to the City's thorntonco.gov domain. Sites that are not transferred are being remediated by the current hosting vendor.
- External Websites that Provide City Services – The City has contacted external website vendors to help ensure their services meet digital accessibility standards and the Technology Accessibility committee is tracking their responses for appropriate follow-up.
 - April 1, 2025 – The City has continued this effort including documenting VPATs when provided.
- City-Wide Training – As of June 28, 2024, over 90% of City staff completed City-provided digital accessibility training that outlined staff's roles and responsibilities under the digital accessibility law and identified digital accessibility resources available to them. New employees will be required to take this training within one month of their hire date.
 - Based on feedback received from City staff seeking additional digital accessibility resources, the City's internal intranet page has been updated with additional resources and information placed in an easy to find location on the site for City staff to access.

- Other City-provided trainings are being updated to include discussion of digital accessibility, where appropriate. For example, training related to the provision of records under the Colorado Open Records Act now incorporates discussion of digital accessibility.
- Conducted a City-wide intranet campaign where staff shared examples of how they are incorporating accessibility into their workloads or demonstrating knowledge of accessibility tools and standards.
- Administrative Directive – The City has created an Administrative Directive (i.e., Citywide policy) outlining compliance requirements for City staff as it relates to the digital accessibility law.
- Created a Process for requesting redress for inaccessible digital products including contact options that are not dependent on Web Access or Digital Accessibility that is displayed on all front-facing webpages. This process includes the option to request redress for inaccessible digital content via phone or email.
- Hardware ICT List – Created a catalog of all hardware makes/models the City has and the accessibility features of the devices to help ensure all digital assets are reviewed, prioritized, and updated as necessary to comply with the digital accessibility law. This list has been shared with City staff and is updated as new technology is added to the City's fleet.
- The City has begun contacting internal service providing vendors to help ensure their services meet digital accessibility standards and the Technology Accessibility committee is tracking their responses for appropriate follow-up.
- In June 2025, the City conducted preliminary interviews for hiring a full-time Digital Accessibility Specialist.

Websites created and maintained by City employees:

The Communications Department and Information Technology division created the Administrative Directive 1-27, ThorntonCO.gov Web Content Management governance plan for the ThorntonCO.gov city website and published it on the Cotstaff.net intranet on August 27, 2024. The new Directive establishes guidelines, processes, and permissions for Web Authors who manage content on the ThorntonCO.gov website. The Administrative Directive aims to ensure the integrity, security, accessibility, and continuity of website content while minimizing risks associated with unauthorized modifications, deletions, or additions. The Directive outlines clear responsibilities and

roles for Web Authors while promoting effective content management practices and safeguarding Thornton's digital assets.

Currently, the ThorntonCO.gov website is the responsibility of the Communications Department. Information Technology assists with the management of all other website domains.

The City contracted with Upanup to develop a new website to comply with the Digital Accessibility Law, following WCAG 2.1 AA standards and replace the City's existing ThorntonCO.gov website. Upanup developed the website with Drupal (a content management software). Drupal's core CMS functionality is designed to provide configurations to achieve accessibility compliance within the following areas:

- Search form and presentation
- Color contrast and intensity
- Adding skip navigation to core themes
- Image handling
- Form labeling
- Removing duplicate or null tags
- Semantic markup compliant for screen readers

An a11y-checking tool was included in the WYSIWYG content editor to assist web authors with ongoing accessibility compliance.

The new website was launched on June 25, 2024, and ongoing content management such as adding titles, alt text on images, content structure and proper use of headings, etc., is and continues to be a fundamental responsibility of Web Authors and Technology POCs.

Regardless of overall governance, content creators will be responsible for ensuring that content they contribute to the City's website is compliant with WCAG 2.1 AA. Each department has designated Technology POCs who will assist with the responsibility of ensuring compliance by reviewing web tools and content to keep the websites updated and compliant with the Digital Accessibility Law. The City will provide training to ensure that such employees understand their responsibility and are properly trained in how to meet those requirements.

Electronic Documents:

Remediation efforts for pre-existing electronic documents will involve City content creators, Technology POCs, Digital Accessibility Specialist and an external remediation vendor. Content creators are in the process of reviewing and documenting site content for remediation efforts. The review will include an analysis of their department's

documents and a request for external remediation or a decision to internally remediate their documents. The remediation process of documents has been started as of the date of this Plan.

As of May 2024, Technology POCs have made a good faith effort to create accessible PDFs and have been directed that as of July 1, 2024 all newly created PDF documents need to meet accessibility requirements of WCAG 2.1 AA. In an effort to meet this requirement, Technology POCs and content creators have followed this schedule:

- Effective October 17, 2023, City staff have been instructed to never create PDF documents from scanned images of files.
- Content creators responsible for posting electronic documents on City websites will review all electronic documents under their responsibility and remove all documents scheduled for destruction in accordance with the City's record retention schedule by December 31, 2023.
- Content creators responsible for creating electronic documents are required to complete trainings, implement those trainings in their practices, and reach out to designated staff for assistance when needed. This policy will be described in additional detail in a forthcoming Administrative Directive.
- Technology POCs are responsible for assisting staff in these efforts and providing effective and accurate information regarding accessibility requirements.

Websites created and maintained by third parties:

As of October 2023, all third-party website vendors who create and/or maintain websites for the City were notified of the requirements of the Digital Accessibility Law and the date by which they must be compliant with those requirements.

As of May 2024, vendors were contacted again to provide a status update on meeting the requirements of the Digital Accessibility Law. These results are being tracked by the Technology Accessibility Committee. The tracking of these results will be reviewed during the renewal of service contracts with vendors and actions will be taken based on factors such as: the vendor's ability to meet the requirements of the Digital Accessibility Law, the ability of the vendor to provide reasonable accommodations when it cannot fully comply with the Digital Accessibility Law contract requirements, and other relevant factors. When renewing service contracts with vendors or soliciting new vendors to provide or maintain ICT on behalf of the City, the City will ensure that the vendor's ability to comply with the Digital Accessibility Law is a primary factor when determining which vendor to select.

The City contributes content to third-party social media websites, such as Facebook, to inform the community of City services, offerings, and events. The City will ensure that this content complies with the Digital Accessibility Law at the time it is submitted, and

will monitor its posts for compliance, but does not control or maintain these third-party websites after content is submitted for posting.

Other ICT

The Information Technology division has created a list of all physical ICT and is in the process of cataloging available accessibility features of these systems, including but not limited to, laptops, desktops, kiosks, copiers, and printers.

The City will catalogue all remaining ICT not specifically identified in this Plan to determine whether it is in compliance with the Digital Accessibility Law. If remediation or replacement with alternative forms of ICT is deemed necessary, the City will take steps to ensure such ICT is accessible.

Compliance Standards and Reasonable Accommodations/Modifications

In accordance with the OIT Rules, public entities are not responsible for remediating ICT that is not in active use. The City will comply with the OIT Rules and will not proactively remediate ICT that is not in active use beginning as of July 1, 2024.

Public entities also are not responsible for taking any action that would fundamentally alter the nature of their programs, services, or activities, imposes an undue burden, or poses a direct threat to the health or safety of others. As such, the City will remediate ICT only to the extent that doing so does not result in an undue burden, fundamental alteration, or pose a direct threat.

If an individual with a disability, on the basis of such disability, cannot access or does not have equal access to a program, service, or activity through the City's ICT, the City will provide a reasonable accommodation or modification for alternative access, to the extent such accommodation or modification does not result in an undue burden, fundamental alteration, or pose a direct threat. Requests for reasonable accommodations or modifications can be made in accordance with the Communications and Support section of this Plan.

When determining whether an accommodation or modification poses an undue burden or direct threat, the City shall comply with the guidelines set forth in the OIT Rules.

A reasonable accommodation, as it pertains to internal-facing ICT, is a change or adjustment to a job or work environment that will enable a qualified individual with a disability to access internal-facing ICT.

A reasonable modification, as it pertains to public-facing ICT, is a change in policies, practices, or procedures that is necessary to enable an individual with a disability to

access public-facing ICT in order to access the public entity's programs, services, and activities.

Anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City, including a complaint alleging discrimination related to the accessibility of City technology, may obtain a copy of the City's grievance procedure by [emailing the Digital Accessibility Specialist](#) or calling 303-538-743.

Digital Accessibility Training Program:

In addition to its initial remediation and coordination efforts the City has established training programs to continue to improve the accessibility and usability of the City's public-facing and internal-facing ICT. A Digital Accessibility Information & Resources web page has been created on the City's Intranet and is updated as new resources and educational information become available or as new policies and procedures are established.

The City's Communications and Information Technology Departments, as well as external vendors, are identifying training resources and techniques that will be specific to unique accessibility issues associated with the extensive variety of external web application types. Training and guidance will include specific issues, such as how to determine if the identified accessibility barrier is valid, steps to check, and remediation procedures.

In March 2023, the City paid for unlimited seats for Siteimprove's Accessibility Trainings (Frontier). Any staff member who creates digital content can request access from the Communications Department to take the offered trainings. Examples of training offered include:

- Accessibility for Content Contributors
- Fundamentals of Alt Text
- Accessibility for PDFs

The Technology Accessibility Committee and Digital Accessibility Specialist will continually seek out and evaluate potential training opportunities that may be beneficial to City staff and that will help staff ensure the City's compliance with the Digital Accessibility Law.

Annual Status Updates

The Technology Accessibility Committee will regularly monitor the status of this Plan and the City's progress on implementing auditing and remediation compliance efforts. On an annual basis, the Technology Accessibility Committee will review this Plan and

update portions as the Committee deems necessary. At a minimum, the Plan will be updated annually to provide a status update related to the City's progress on advancing technology accessibility and the information will be incorporated into the City's overall ADA Transition Plan.