



City of Glenwood Springs

Digital Accessibility Plan

Updated November 2023

Accessibility is a commitment to providing equitable access to our services, not an item on a project checklist. It is the responsibility of each City employee and not a single person, team, or department.

This plan will be updated as needed to reflect changes in technology and best practices for meeting accessibility requirements.

Background Information

Americans with Disabilities Act (ADA)

Although there are not regulations in the Americans with Disabilities Act (ADA) that directly relate to web accessibility, the Department of Justice (DOJ) has a long-held position that the ADA covers websites. The DOJ states that covered entities under the ADA are required to provide effective communication regardless of whether they generally communicate through print media, audio media, or computerized media such as the Internet. Covered entities that use the Internet for communications regarding their programs, goods, or services must be prepared to offer those communications through accessible means as well.

The City of Glenwood Springs is a Title II organization under the ADA.

Colorado House Bill 21-1110

Passed in 2021, Colorado House Bill 21-1110 (HB 21-1110), Colorado laws for persons with disabilities, strengthens protections for persons with disabilities. The compliance date is before or on July 1, 2024.

What We're Doing to Improve Digital Accessibility

This plan and guidance are just part of a meaningful change in making City services as inclusive and accessible as possible. The City of Glenwood Springs is also committed to:

- Designing digital accessibility policies, guidelines, and strategies alongside partners with a diverse range of abilities and perspectives.
- Providing a range of easy-to-find paths for people to request accommodation and report accessibility issues.
- Providing staff with ongoing training, support, and resources for digital accessibility.

- User-friendly, accessible guidelines to help City employees make web content accessible to users with sensory, cognitive, and mobility disabilities, and ultimately to all users regardless of ability.
- Improving procurement processes and supporting City employees with procurement guidelines, training and support.
- Following Web Content Accessibility Guidelines (WCAG) 2.2 AA as our minimum standard of accessibility when developing new materials and updating existing materials by priority.

Impact

Accessibility is one of the most important parts of creating web services because when you improve the online experience for people with disabilities, you improve usability for all. In addition, you enhance trust in government, drive innovation, and extend service reach. The quality of accessible content you create and share is the difference between a colleague or community member's success and failure in their ability to accomplish a goal or receive essential services.

Accessibility Policy

The City of Glenwood Springs ensures meaningful access to City programs, services, and activities to comply with the Americans with Disabilities Act (ADA) and reasonably provides translation, interpretation, modifications, accommodations, alternative formats, auxiliary aids, and services. To request these services, email ADAteam@cogs.us or call 970-384-6441. Please submit requests as soon as possible but no later than three business days (Monday-Thursday, excludes holidays) before scheduled events.

Governance, Roles, and Responsibilities

Designing, developing, and maintaining accessible technology starts by understanding roles and responsibilities.

ADA Team

The ADA Team will be comprised of at least three staff members including a representative from the Administration department, a manager from the Parks and Recreation department, and a representative from the Information Technology department.

This group is responsible for meeting once each quarter to track progress on this plan, review updates from the State of Colorado Office of Information Technology (OIT) related to digital accessibility, make recommendations for improving digital accessibility, and lead projects related to digital accessibility compliance.

Procurement

The City Clerk and City Manager oversee procurement for the city and are responsible for implementing policies and procedures to ensure applicable vendor products and services are in alignment with federal and state accessibility requirements and this plan.

Content Creators

Any City staff who creates print or digital materials, documents, or webpages is a content creator and has the responsibility to create an equitable experience for users of all ability levels.

The goal is to create content that is accessible as it's created by understanding the State Accessibility Technical Standards and best practices for meeting compliance guidelines for all digital content produced by the City.

Leaders and Managers

Managers inspire action by communicating the roles and responsibilities that employees have in achieving the vision by creating clear goals for employees and through providing accessibility training and tools. The role of leaders and managers is to:

- Create accessibility goals and expectations for employees that support professional growth.
- Communicate that accessibility is a priority by setting individual goals and tracking progress through performance evaluations.
- Increase accessibility skills across teams by encouraging that employees participate monthly practice exercises offered through the employee newsletter and other accessibility training such as those offered by the Rock Mountain ADA Center or the state's Office of Information Technology (OIT).
- Ensure that all newly procured technology is accessible and compatible with assistive technology.

Evaluation and Remediation

To identify priorities for content remediation and encourage new content to meet requirements, the City has implemented the AudioEye reporting program on the main city website (cogs.us) and the parks and recreation website (GlenwoodRec.com). In addition to providing accessibility tools to front end users, AudioEye includes a monthly report of issues fixed by the AudioEye software and identifies issues that must be fixed at the source or need a custom fix.

The City has identified that the priority for content remediation is as follows:

1. Business critical content (EX: utility services and billing, permits, municipal court information, public records request, staff directory, business licensing, forms, etc.)
2. High community interest content (EX: project information, special event information, etc.)
3. All other website and digital content by request

Due to funding and staffing limitations, remediating all digital content before the July 2024 deadline would cause an undue burden to the City of Glenwood Springs. By prioritizing content and providing paths for content to be requested in alternative formats, we ensure equal access to our programs and services.

For new content, content creators are responsible for developing and publishing content that meets best practices for digital accessibility. For assistance in developing or reviewing accessible content staff may contact the Public Information Officer for guidance.

Skills and Training

As part of the mission of the City of Glenwood Springs, managers will coordinate with staff on presentations for their offices to be compliant with the standards of the ADA.

During their training, staff members, managers, coordinators, and other personnel will learn the basics of web accessibility which includes the knowledge, skills, abilities, and other characteristics of how to effectively communicate with members who use these services.

Communication & Support Process

Through established communication and support processes, the City is able to track and resolve incoming accessibility complaints and ensure that there are clear and well-tended channels for receiving feedback on digital accessibility issues. These criteria include internal communications regarding accessibility process improvement, resources, and training as well as public statements of compliance.

Public Notice and Grievance Procedure under the ADA are listed on city websites and posted in public-facing city buildings including City Hall, the Community Center, and the Community Arts Center. To view these notices or to file a complaint, members of the public can visit, cogs.us/ADA.

The Accessibility Policy text shall appear in full or as a link on all digital platforms including websites, social media platforms, public notices, staff email signatures, and digital newsletters. Broad distribution of the policy will help encourage community awareness for the city's accessibility policy.

Read more at cogs.us/ADA.

Procurement and Vendor Management

The City of Glenwood Springs plans to utilize the [State of Colorado's procurement toolkit](#) to guide procurement efforts.

The City will add boilerplate language to new contracts outlining accessibility expectations and requirements.

The vendor accessibility checklist should be referred to before purchasing digital products and services. It provides guidance about what to look for when evaluating digital products and services, including questions and information that can be requested of vendors.

The vendor should indicate whether the goods and/or services proposed to be provided fully conform with the accessibility guidelines of the WCAG 2.2 level A and AA published by the World Wide Web Consortium (W3C).

During vendor demonstrations, the vendor should demonstrate the WCAG 2.2 level A and AA published by W3C.

Action Plan

This action plan will be updated as needed by the ADA Team.

Plan Section	Task	Staff Lead	Notes
Evaluation and Remediation	Annual Digital Accessibility Review	ADA Team & Department Heads	To be completed in 2024
Evaluation and Remediation	Quarterly Accessibility Committee meetings	ADA Team	Ongoing, quarterly
Evaluation and Remediation	Monthly AudioEye reports	ADA Team	Ongoing, monthly
Evaluation and Remediation	Remediating forms	ADA Team	Great progress has been made on frequently utilized forms. Remediation is ongoing for city forms.
Skills and Training	Module One – All staff accessibility training	Human Resources	Ongoing - All employees have either completed the training or receive training during onboarding.
Skills and Training	Module Two – Content creator training on accessible Microsoft Word products (email, documents, PowerPoint)	Human Resources	Ongoing - All employees have either completed the training or receive training during onboarding.
Skills and Training	Module Three – Website editors training	Public Information Officer then Human Resources	Module is in development. Applicable staff planned to receive training by March 2024.
Skills and Training	Module Four – Digital accessibility on social media training	Public Information Officer then Human Resources	Module is in development. Applicable staff planned to receive training by March 2024.

Plan Section	Task	Staff Lead	Notes
Skills and Training	Update job descriptions to reflect required trainings	Human Resources	In progress – job descriptions are updated upon publishing for applicants.
Skills and Training	Staff newsletter	Executive Administrative Assistant, Human Resources	Ongoing, monthly task
Communication and Support Process	Post ADA notice and grievance procedure online and in public areas	Public Information Officer	Complete
Communication and Support Process	Track and respond to grievances submitted to the City	ADA Team	Ongoing as needed
Procurement and Vendor Management	Reviews and validate that contract language in procurement documents addresses accessibility standards compliance	City Manager and City Clerk	In progress - The City will add boilerplate accessibility language to new contracts
Procurement and Vendor Management	Vendor Letter Template to send to existing vendors letting them know of their compliance requirements	City Manager, City Clerk, and Executive Administrative Assistant	In progress

For additional information and guidance, visit oit.colorado.gov/accessibility.