



WESTMINSTER
COLORADO

**The City of Westminster's
Digital Accessibility Transition Plan
Progress to Date
07/01/2024**

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Introduction

The City of Westminster is dedicated to ensuring its online services are accessible to the broadest audience, regardless of technology or ability. We aim to provide an online experience that meets "Level AA" compliance according to the Web Content Accessibility Guidelines v2.1 (WCAG 2.1).

This accessibility plan outlines our long-term strategy for enhancing the accessibility of city information. It includes a summary of our web accessibility self-evaluation, transition plan, and ongoing management plan.

Overview of Colorado Laws for Persons with Disabilities (HB21-1110)

On June 30, 2021, the HB21-1110 Act was signed. This act added language to strengthen the current Colorado law for protection against discrimination against persons with disabilities. This specifically relates to accessibility with government information technology.

The added provisions include:

- Prohibiting a person with a disability from being excluded from participating in or being denied the benefits of services, programs, or activities of a public entity or a state agency.
- Clarifying that such prohibition includes the failure of a public entity or state agency to develop an accessibility plan and fully comply, on or before July 1, 2024, with accessibility guidelines established by the Office of Information Technology (OIT).
- Any Colorado agency with the authority to promulgate rules shall not promulgate a rule that provides less protection than that offered by the "Americans with Disabilities Act of 1990".

Overview of Grace Period Noncompliance Digital Accessibility (HB24-1454)

Colorado HB24-1454 was signed into law on May 24th, 2024. This bill provides a one-year extension to July 1, 2025, of immunity from liability for failure to comply with the digital accessibility standards as defined by HB21-1110 for an agency that demonstrates good faith efforts toward compliance or resolution of any complaint of noncompliance.

Digital Accessibility Policies, Guidelines and Resources

Digital Accessibility Statement

The City of Westminster is committed to providing digital services that are accessible to the broadest possible audience, regardless of technology or

ability. We are actively working to increase the accessibility and usability of our website and in doing so adhere to many of the available standards and guidelines. Our goal is to deliver a web experience that achieves "Level AA" conformance according to the Web Content Accessibility Guidelines v2.1 (WCAG 2.1).

In the meantime, to accommodate all individuals and ensure accessibility to the public, we have staff ready to assist you in accessing all functions of the city's website and other technology by calling 303-658-2400

Website Assistance – Grievance and Accommodation Request

If you need assistance with a website function, please call 303-658-2400 Monday through Friday from 8 a.m. to 5 p.m. and a representative will be ready to assist you.

To request reasonable accommodations or modifications, or to report inaccessible content, please reach out to the ADA Coordinator through any of the following means:

- Form: [Submit an Online Form Here](#)
- Phone: 303-658-2400
- E-mail: jbonavid@westminsterco.gov
- Visitor Address: 4800 W. 92nd Ave, Westminster, CO 80031

Within 7 calendar days after receipt of the issue/request, a staff member or the ADA Coordinator will contact the person initiating the issue/request to discuss the problem and the possible resolutions.

Within 14 calendar days of the meeting, the ADA Coordinator will respond in a format accessible to the submitter. The response will offer options for a resolution. If the response by the accessibility committee does not satisfactorily resolve the issue/request, the submitter or their designee may submit a grievance through the City Attorney's Office. [Submit a Grievance Here](#).

The City of Westminster's Digital Accessibility Policy

Under Colorado Laws for Persons with Disabilities (HB21-1110), the City of Westminster must provide persons with disabilities equal access to city programs, services, and activities, including those programs, services, and activities that are made available through city websites and other online technology. This policy has been developed to promote equal access to such programs, services, and activities provided through the city to persons with disabilities. This policy applies to all online technologies, including city customer-facing websites, mobile applications, electronic communication, and digital documents such as portable document format (PDF).

Digital Accessibility Team

Accessibility Committee

In January of 2023, a digital accessibility committee was formed including members from the following departments:

- City Attorney's Office
- Communications
- Information Technology
- Risk Management

This committee met every month through March of 2024 and was tasked with the following to meet requirements as outlined in CO HB21-1110:

- Identify digital assets.
- Evaluate and purchase tools to assist with identifying and remediating compliance issues.
- Develop ADA language to be included in new RFPs and contracts for 3rd party products with a digital component.
- Determine roles and responsibilities as outlined below:
 - City Attorney's Office: Assist in interpreting the law, provide ADA language to be included on our public website, letters to our technology vendors, RFPs, and technology contracts, and review ADA statements and policies.
 - Communications: Once our newly redesigned, ADA-compliant public website goes live in the first quarter of 2025, work with content producers to moderate new website content and documents to ensure compliance. Attend training provided by vendors and internal staff.
 - Information Technology: Purchase tooling, create training programs for staff, create the City's digital accessibility plan, and update every quarter.
 - Risk Management: Work with Communications, Information Technology, and City Attorney's Office to unify ADA messaging across physical and digital spaces.

ADA Champions Team

We have formed an ADA Champions team comprised of representatives from Information Technology, Communications, and Risk Management. The members of this group will provide guidance and direction for any external or internal questions/concerns regarding ADA as related to compliance of our physical spaces and digital assets. This group will meet on an as-needed basis, no less than once per quarter to discuss progress, improvement opportunities, and any

issues that need to be addressed. This group will update our progress to date report on a quarterly basis.

Remediation and Compliance Efforts

Digital Assets

- Website Content
 - Websites
 - www.westminsterco.gov
 - The current site is hosted and managed internally
 - The newly redesigned site will be hosted with a 3rd party vendor, with content managed on-site by City staff.
 - www.westminstereconomicdevelopment.org
 - Managed by a 3rd party vendor. City staff manages site content.
 - www.westyweddings.com
 - Managed by a 3rd party vendor. City staff manages site content.
 - <https://westm.ent.sirsi.net/>
 - Managed by a 3rd party vendor. City staff manages site content.
 - Content Review
 - Inventoried and created a list of site pages. Using site analytics, representatives from our Communications and other departments are working together to evaluate content to determine which pages need to be migrated to the newly redesigned site.
 - Monsido
 - The city utilizes Monsido, a website auditing tool, which scans the website and gives an immediate status report of the city's website compliance levels. This tool will be used to identify compliance issues on both the current and new websites.
 - Content Remediation
 - Current Site
 - Reviewed site analytics and identified the pages included in the top 30% of pages visited.
 1. City of Westminster > Homepage
 2. Book Tee Times
 3. Legacy Ridge Golf Course
 4. City Park Recreation Center
 5. Libraries

6. Walnut Creek Golf Preserve

- Redesigned Site
 - The newly redesigned site will be hosted with CivicPlus. CivicPlus staff will ensure that all content migrated for the initial site launch in January 2025 will be compliant.
 - For content added after the initial launch, our Communications team will include ADA compliance in their content moderation process. If content is not compliant, it will be remediated before being published on the site.
- PDFs and Documents
 - Inventory
 - Inventoried and created a list of site documents.
 - Content Review
 - Using the inventory list and site analytics, representatives from our Communications and other departments are working together to evaluate documents to determine which documents need to be migrated to the newly redesigned site.
 - Allyant CommonLook PDF and CommonLook Office
 - Document owners will use this tool to identify document compliance issues.
 - Document Remediation
 - Current Site
 - As the team evaluates documents, those deemed unnecessary will be removed from the site.
 - Redesigned Site
 - Document creators will remediate existing documents on the new site. Any new documents will be compliant. Document editors and creators will use the CommonLook tools to ensure documents are compliant.
- 3rd Party Applications
 - Inventory
 - The Accessibility Committee compiled a list of our 3rd party digital assets and the associated vendor.
 - Vendor Notification
 - The Accessibility Committee created a letter for our vendors making them aware of CO HB21-1110. This letter is currently being updated to reflect HB24-1454, and will be sent to all vendors of our 3rd party digital assets in the third quarter of 2024.

- Vendor Failure to Comply
 - For applications currently under contract, prior to renewal, the City will look for alternative vendors or solutions that meet accessibility standards and evaluate the feasibility of transitioning to a compliant solution and the associated costs and timeline.
- In-house Custom Developed Applications
 - Our internal software development team is in the process of rewriting our in-house, custom-developed applications in a new technology stack. For applications in our previous technology stack, as applications are updated or enhanced, the developer will update to comply. All applications written in the new technology stack will be compliant when moved into production.

Tooling

The City of Westminster will incorporate a variety of tools, techniques, methods, and processes to identify accessibility barriers and 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 will use in its accessibility compliance initiatives.

- Monsido
 - The city utilizes Monsido, a website auditing tool, which scans the website and gives an immediate status report of the city's website compliance levels. This removes the guesswork and provides focus to meet current web accessibility standards (WCAG 2.1, AA). The Monsido tool also provides remediation suggestions.
- AudioEye
 - AudioEye is a web overlay tool that will be installed on the newly redesigned site. AudioEye provides expert audits, automated remediations, continuous monitoring, and custom fixes.
- Allyant CommonLook PDF and CommonLook Office
 - The city utilizes Allyant CommonLook PDF and CommonLook Office to remediate existing PDFs and Microsoft Office suite and to create new, ADA-compliant PDFs/Documents.
- Google Lighthouse
 - Google Lighthouse is a website auditing tool built into the developer tools in Chrome. It scans the web page and provides an accessibility score, along with compliance issues and remediation tips.
- WebAIM WAVE

- WAVE is a free browser extension available for Chrome, FireFox and Microsoft Edge. It scans the web page, identifies compliance issues and provides references to remediate.

User Training

Information Technology is creating a training curriculum for our Communications staff and website content creators.

Training will include:

- How to use the Monsido tool to identify and remediate non-compliant web content, as well as create new, compliant content.
- How to use the CommonLook tool to identify and remediate non-compliant documents, as well as create new, compliant documents.
- What it means for web content and documents to be compliant.
- How to remediate web content and documents to be compliant.
- Working sessions with web content and document creators.

Procurement of Digital Services

Policy for Procurement of Digital Services

All digital services contracts must be reviewed by the City's Chief Information Security Officer, IT Services Administrator and City Attorney's Office.

Procurement Contract Language

The Accessibility Committee created language outlining the vendor's responsibilities to comply with CO HB21-1110. This language is included in all new digital asset contracts.

Request for Proposal (RFP) Language

The Accessibility Committee created language outlining the vendor's responsibilities to comply with CO HB21-1110. This language is included in all new RFPs.