Digital Accessibility Progress-to-Date Report

City of Fort Collins, Colorado

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Accessibility Standards Applied

The City of Fort Collins has contracted with Nelnet Diversified Services to develop accessibility technical standards with the intent of providing enterprise standard configurations for technologies which provide service to those with disabilities, in accordance with the technical standards provided by:

- World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.1 Level AA or higher

- [Section 508 of the U.S. Rehabilitation Act of 1973 Chapters 3,4,6;](#)

- [OIT Adopted Rules Establishing Technology Accessibility Standards, 8 CCR 1501-11;](#)

- and following C.R.S. § 24-85-101 et. *seq.*

Other Accessibility Considerations

Although our goal is WCAG 2.1 Level AA conformance, we may also apply some Level AAA Success Criteria or WCAG 2.2 Level AA conformance criteria as appropriate to make digital content more usable.

Our Efforts: Progress-to-Date Report

The City of Fort Collins is committed to providing equitable access to all Coloradans. Our ongoing accessibility effort works towards the day when all City services, programs, and activities are accessible, providing equal access to information and services to all Coloradans.

To that end, the City of Fort Collins is creating a plan to prioritize, evaluate, remediate, and continuously improve every digital touchpoint within our services, programs, and activities. Below, you will find just some of the measures that the City of Fort Collins is undertaking.

2022

- Team meetings to learn about HB21-1110 and start to identify department roles.

- Meetings included City Attorney's Office (CAO), Communications and Public Information Office (CPIO), Information Technology (IT), Operations Services, Purchasing, Equity Office, City Manager's Office (CMO).

- Research on HB21-1110 and peer cities approach.

- Prior Lead Equal Opportunity Compliance & Investigator Specialist started training in Digital Accessibility.

- Purchasing to include clearer language on ADA compliance in contracts.

- Worked with Old Town Media to review website content; web pages are in compliance with WCAG 2.1

- Reworked the City brand guidelines and color palette to meet contrast accessibility requirements.

- Educated communications staff and supplied a color reference Do's and Don'ts guide.

- Developed an internal SharePoint site to educate the organization on the existing accessibility laws and best practices around Universal Design.

2023

- Continued cross-department meetings to create an outline of workstreams.

- Participated in learning State rulemaking for HB21-1110.

- Meetings with peer cities of Colorado Springs and Englewood for peer learning.

- On-going research and training on ADA work.

- Purchasing added clearer language on technology accessibility compliance in contracts.

- Expanded color accessibility review process to sub-brands within the organization to meet ADA standards (Connexion, Gardens, Natural Areas, Lincoln Center); updated palettes and brand guidelines; offered training.

- Lead Equal Opportunity Compliance Specialist position split into 2 FTEs to give priority and focus. Positions now include:

  - Lead Equal Opportunity Compliance Specialist (LEOCS) was hired in November 2023 and started in December 2023. Jan Reece; 970-416-4254; adacoordinator@fcgov.com

2024 Q1-Q2

All initiatives listed below have been started and are in progress:

- LEOCS meets with ARC of Larimer County, a community agency to help guide web accessibility mapping.

- Digital Accessibility Team including CAO, CPIO, IT, Operation Services, Purchasing, Equity Office, CMO.

- Review of City policies by Equity and Inclusion Officer and LEOCS.

- New members of the Disability Advisory Board were selected and appointed.

- Ongoing training on topics such as Title VI and Digital Accessibility.

- Ongoing Digital Accessibility Team Meetings to discuss progress with HB 21-1110.

- Onboarding meeting for introductions to Nelnet, hired consultant to address Digital Accessibility requirements.

- Communications staff began trainings regarding PDF accessibility; trained staff began coaching other staff on best practices.

- FAQ document created for staff to understand requirements, next steps, and responsibilities.

- Tech/software inventory completed by Service Areas. Results shared with Nelnet.

- Under the [City website legal disclaimer](#) page, updated Reasonable Accommodation Request, ADA/Accessibility Complaint Form, Digital Accessibility Complaint Form, and Title VI Complaint Form on FCGov.com.

- Meeting with ADOBE company, training for staff – have also met with other vendors to inform them of accessibility requirements and expectations. For example, the procurement of a new website vendor (Granicus) and parameters around what will be required of the new site, specific to FOCO and Colorado law.

- Team members attending the ADA Symposium

- Purchasing Accessibility Consultant initiated.

- Provided an overview of HB 21-1110, the OIT adopted rules, and best practices to management staff.

- LEOCS contact information added to City website.

- Evaluate contracts from peer cities for hiring a consultant to assist the City in meeting accessibility requirements:
  - Leverage peer cities for RFP search.
  - Consultant selection and scope of work; contract signing in June.
    - Consultant will provide a Digital Accessibility Roadmap to complete a comprehensive analysis of the City's current state of digital information and communication technology (ICT) accessibility, recommendations for remediation, and an evaluation of the level of effort required to evaluate compliance.

- Developed enhanced City intranet resources and guidelines pertaining to accessibility, e.g. graphics and design-related elements, digital documents (PDFs, etc.), website requirements (WCAG), IVR (TTY/TDD) resources/vendors.

- Internal SharePoint page created to help guide City staff on best practices learned regarding accessibility and HB 21-1110, offer resources and guidance on questions around accessibility and began a framework for staff to follow to best meet the expectations of HB 21-1110.

- Consultant delivered first draft of the Digital Accessibility Roadmap and City of Fort Collins Progress to Date Report.

2024 Q3

All initiatives listed below have been started and are in progress:

- Ongoing Digital Accessibility Team Meetings to discuss progress with HB 21-1110.

- Consultant working with Service Areas to prioritize ICT and create representative samples for future accessibility audit.

- Consultant meets weekly with Digital Accessibility Team to update progress on the Digital Accessibility Roadmap.

- Consultant working with Digital Accessibility Team to create a process for Adobe PDF documents.

- There is a planned transition of Case Management Systems from Avenue V's Full Court Enterprise to Tyler Enterprise's Municipal Justice 10 which will increase accessibility of said system. Accessibility Accommodation request brochures and posters complete and ready for delivery to customer facing departments.

2024 Q4

- Ongoing Digital Accessibility Team Meetings to discuss progress with HB 21-1110.

- Prioritization of ICT and creating representative samples for future accessibility audit is 90% complete.

- The City's Digital Accessibility Plan has been updated with high-priority digital content for audit and specific plans for governance, roles, and responsibilities, evaluation and remediation, skills and training, communication and support, procurement and vendor management, and software development lifecycle.

- The process for Adobe PDF documents (used internally as well as within the City's Digital Accessibility Plan) is complete and will be added to as needed questions or scenarios present themselves.

- The City is planning to participate in digital accessibility training for its employees in 2025.

Accessibility Maturity

Based on the State of Colorado standards, the City of Fort Collins is at the following accessibility maturity level for 2024.

Current Stage Selected	Stage Name	Stage Description
	Inactive	No awareness and recognition of need. At this stage organizations are inventorying their technology, have begun to make investments, etc.
X	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.

Why We Are at the Launch Stage

We have made great progress since HB21-1110 has passed in July 2024 considering substantial challenges to the City of Fort Collins:

- Monitoring OIT's progress on the rules establishing technology accessibility standards, which were ultimately adopted by February 23, 2024.

- Timing and aligning budget resources; 2-year budget cycle and budget constraints.

- Staff turnover and personnel changes.

- LEOCS position staff change staffing gap between August- December 2023.

- Complexities with negotiating contracts with vendors regarding digital accessibility requirements.

- Challenges of educating and coaching staff on compliance work and adjusting workloads; steep learning curve with limited resources across a large organization.

- Need for a review of internal technology policy.

- The challenge of moving away from prior best practices; retrofitting to meet compliance requirements is a hardship due to the time investment needed for staff to relearn processes.

Further Organizational Measures To Achieve?

- Define an accessibility roadmap including timeline, goals, roles, responsibilities, and policies as needed for our organization.

- Include accessibility in all procurement processes.

- Conduct and maintain an inventory of technology then prioritize, validate through testing, and address issues that are found in active use of digital content.

- Create and implement a plan for providing reasonable accommodation and modification until the technology can be made accessible.

- Provide contact information and support for receiving accessibility feedback and accommodations requests.

- Hire people with accessibility skills and train current employees on providing accessible services and technology.

- Incorporate accessibility requirements into our technology development stages including design, development, user experience, and quality assurance.

- Creation of IT Review Board (ITRB) to enforce legal and regulatory aspects of technology acquisition through departmental review prior to onboarding technology.

- Create a centralized review funnel for all future purchased and actively used software.

- Create milestones for the audit and remediation of digital content in active use.

- Create list of archived web content.

- Create list of digital content that cannot be remediated due to undue burden.

Progress & Updates

The Progress to Date Report is a living document. The City will review this report quarterly. Examples of events that would require a review and update to this document include but are not limited to:

- changes to the Complaint or Accessibility Request processes.

- when a new individual or organization is made responsible for ADA Coordination tasks.

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

Update History

Date	Version	Description	Approver (Role & Department)
06/30/2024	1.0	Initial release	
09/30/2024	2.0	2024 Q3 progress update	
12/13/2024	3.0	2024 Q4 progress update	

Report a Digital Accessibility Problem

If you would like to report a digital accessibility problem with the City of Fort Collins, please visit the City's website.

Glossary of Terms

- **Active Use**: The rules apply to all ICT that:
  - Is in active use on or after July 1, 2024, and
  - Is newly created, developed, acquired, or purchased on or after July 1, 2024.

  Active use means:
  - regularly used by members of the public to apply for, gain access to, or participate in a public entity's services, programs, or activities, and
  - currently used by employees to perform their job duties. ICT in active use includes the authorized, official version or versions, not previous versions that may still be available, archives, working products, or drafts.
- **Archived Web Content:** Web content that meets all three of the following criteria:
  - maintained exclusively for reference, research, or recordkeeping.
  - not altered or updated after the date of archiving.
  - organized and stored in a dedicated area or areas clearly identified as being archived.
- **Digital Content:** Information or data that is produced and supplied in digital form including but not limited to web sites, videos, and electronic documents.
- **Information and Communication Technology (ICT):** A wide range of commonly used ICT must be accessible, including:

- Software, applications, and websites including content accessed from the internet and on private networks or intranets.

- Multimedia content like images, video and audio

- Documents that are posted to the internet (e.g., Google formats, PDF, Word, Excel, and PowerPoint, etc.)

- Computer software and hardware including desktop systems and mobile systems such as laptops and other mobile computers.

- Desktop and mobile telephones and other telecommunications products that interact with users in real time.

Where hardware has an interface to interact with a person, like a kiosk, then the rules refer to hardware standards as specified by US Section 508 of the Rehabilitation Act of 1973 Chapter 4: Hardware (U.S. Access Board).

- Information kiosks and booths that provide information or user interactions in public places such as government buildings.

- Multifunction machines that scan, fax, print, etc.

- On-premises equipment like servers and routers

Some hardware may contain embedded ICT as an important part of the product, but the primary function of the equipment isn't ICT. The rules do not apply to this kind of hardware. A few examples include:

- An air conditioning system that has a self-monitoring thermostat embedded in the unit.

- Medical equipment where information technology is integral to its operation, such as x-ray machines and other diagnostic equipment.

- **Lead Equal Opportunity Compliance Specialist (LEOCS)**: An individual designated to coordinate and implement ADA compliance activities.

- **Reasonable Accommodation:** is defined in the rules as a modification or adjustment to a program, service, activity, job, or the work environment that will enable an individual with a disability to participate in the program, service, activity, application process, or perform essential job functions.

- **Reasonable Modification**: is defined in the rules as a modification in policies, practices, or procedures when the modifications are necessary to avoid discrimination based on disability.

- **Undue Burden:** is considered an action that requires significant financial, technical, or administrative difficulty or expense.

Resources

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

- [Americans with Disabilities Act Title II](#)

- [Colorado HB 21-1110](#)

- [Web Content Accessibility Guidelines (WCAG) 2.1](#)

- [Colorado Governor's Office of Information Technology Rules Establishing Technology Accessibility Standards, 8 CCR 1501-11](#)

- [Standard Operating Guide for Procuring Accessible Technology for the State of Colorado](#)

- [Colorado IT Accessibility Planning Template](#)