Digital Accessibility Guide

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(CCISDA Capstone Project)

Version: 1.0

Date: August 2025

Document History

Version	Date	Description
1.0	August 2025	Initial Release – CCISDA Capstone Final Project

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Chapter 1: Understanding Digital Accessibility

1.1 Purpose of the Guide

This guide outlines practical strategies for California county governments to achieve digital accessibility, ensuring that all users — including individuals with disabilities — can access and benefit from digital content and services. It provides a framework for understanding legal obligations, identifying common barriers, and applying accessibility practices from the planning phase through ongoing maintenance.

1.2 What is Digital Accessibility?

Digital accessibility is the ability of websites, applications, and digital content to be used by all individuals, including those with visual, auditory, motor, or cognitive disabilities. It ensures that everyone, regardless of ability, can navigate, interact with, and benefit from digital experiences.

1.3 Why It Matters

Digital accessibility promotes inclusivity by allowing all individuals to access information and services without barriers. It is also a legal requirement in many jurisdictions, with regulations such as the Americans with Disabilities Act (ADA) and the Web Content Accessibility Guidelines (WCAG). Implementing accessibility best practices enhances user experience, broadens audience reach, improves SEO, and reduces legal risk.

When websites or forms aren’t accessible, individuals with disabilities may be unable to apply for jobs, access public health updates, or submit essential service requests. Digital accessibility ensures equitable access to services—a fundamental value in inclusive local governance.

1.4 Legal and Compliance Considerations

County governments in California must comply with both federal and state digital accessibility laws to ensure their websites and digital services are accessible to individuals with disabilities. Key legal frameworks include:

Federal Laws:

- **Americans with Disabilities Act (ADA) – Title II:** Requires state and local governments to provide equal access to public services, including websites and digital services. While the ADA does not specify a technical standard, the U.S.

Department of Justice (DOJ) has clarified that **conformance with WCAG Level AA** is an appropriate measure of compliance. As of the time of this writing, the DOJ references **WCAG 2.1 Level AA** as the accepted benchmark, but this may evolve.

- **Section 508 of the Rehabilitation Act:** Requires federal agencies and recipients of federal funding (including some counties) to ensure accessibility of electronic content and IT systems. Section 508 standards are periodically updated to align with WCAG. Agencies should consult Section508.gov for the most current legally binding version.

California State Laws:

- **Government Code 7405:** Requires state and local governments to comply with digital accessibility standards aligned with **Section 508 and WCAG**, as defined at the time of implementation. The statute currently aligns with WCAG 2.0 Level AA, but counties are encouraged to follow the latest recognized standard for stronger compliance posture.
- **Government Code 11135:** Prohibits discrimination in programs and activities funded by the state, including through inaccessible websites or digital services.
- **Assembly Bill (AB) 434 (2017):** Requires state agencies to certify their public websites meet WCAG and Section 508 standards. While the bill references **WCAG 2.0**, agencies are encouraged to track updates from the World Wide Web Consortium (W3C) and the U.S. Access Board to ensure they meet the most recent standards in practice.

While WCAG 2.0 is still referenced in some state-level statutes, **WCAG 2.1 Level AA is widely considered the current legal and professional standard** for compliance under both the ADA and Section 508 frameworks. It includes critical updates that improve access for users with low vision, cognitive disabilities, and mobile devices.

- **Future-Proofing Your Accessibility Strategy**
  Although not currently mandated, **WCAG 2.2**—released in October 2023—introduces additional success criteria focused on users with cognitive and fine motor disabilities. Counties are encouraged to monitor federal and state adoption trends, and prepare for future implementation.
- **This guide aligns with WCAG 2.1 Level AA**, the standard most often referenced in current legal guidance. However, it is intentionally designed

to remain flexible and adapt as newer versions are formally adopted or required by law.

- **Note on Versioning:** The Web Content Accessibility Guidelines (WCAG) are maintained by the World Wide Web Consortium (W3C) and periodically updated. Legal requirements may change over time. For the most current compliance version, consult:
  - W3C WCAG Standards
  - Section508.gov

Resources to support compliance can be found in **Chapter 8.3: Key Resources** and throughout the checklists and templates in this guide.

Chapter 2: Getting Started with Accessibility

2.1 Introduction

At the start of this project, a comprehensive survey was conducted with members of the California County Information Services Directors Association (CCISDA) to understand the current state of digital accessibility awareness and implementation across counties. The 60 responses received—from executives, IT leaders, engineers, and analysts—highlighted varying levels of familiarity with the Web Content Accessibility Guidelines (WCAG) and significant implementation challenges.

2.2 Survey Insights

- **Familiarity with WCAG**: Roughly 50% of respondents demonstrated strong understanding and had begun applying WCAG standards. The other 50% showed limited familiarity, revealing a clear knowledge gap.
- **Accessibility Initiatives**: A majority of counties have initiated efforts, from planning to active remediation.
- **Common Barriers**: Major challenges include resource limitations, outdated systems, third-party vendor issues, and evolving legal frameworks.

These findings confirm progress but underscore the need for continued investment in training, governance, and infrastructure.

2.3 Key Accessibility Challenges by Phase

Barriers to accessibility compliance occur across both pre-implementation and post-implementation phases.

2.3.1. Pre-Implementation Challenges

Lack of Awareness and Buy-in

- Accessibility is often viewed as a one-time compliance task rather than an ongoing responsibility.
- Leadership and departments may not understand its importance or mistakenly assume compliance.

- Resistance may stem from misconceptions or fear of process disruption.

Limited Resources and Competing Priorities

- Accessibility is frequently underfunded.
- Staff and departments struggle to balance accessibility with other priorities.
- The cost of remediating non-compliant systems can delay progress.

Legacy Systems and Technical Debt

- Older websites and applications are difficult to retrofit.
- Outdated platforms may not support modern accessibility standards.
- Scaling improvements across aging infrastructure is complex.

Legal and Compliance Uncertainty

- WCAG guidelines can be interpreted in various ways.
- Fear of legal exposure causes hesitation.
  Many counties lack clear legal guidance or established risk thresholds.

Lack of Standardized Governance

- Departments often act independently, leading to inconsistent compliance.
- There may be no central accountability for accessibility oversight.
- Roles and responsibilities are often unclear.

Training and Knowledge Gaps

- Developers and content creators often lack formal WCAG training.
- Few accessible, easy-to-follow internal resources exist.
- Knowledge varies significantly between teams.

2.3.2. Post-Implementation Challenges

Complexity of WCAG Implementation and Maintenance

- WCAG requirements are technical and frequently updated.
- Some fixes require major restructuring of systems or interfaces.
- Ongoing compliance demands continuous resourcing and training.

Vendor and Third-Party Tool Limitations

- Many external tools lack full WCAG compliance.
- Vendors may deprioritize accessibility unless contractually required.
- Dependence on third-party timelines introduces risk.

Content and PDF Accessibility Management

- PDFs often lack proper tagging or semantic structure.
- Inconsistent publishing practices lead to accessibility gaps.
- Automated tools rarely achieve full compliance.

Monitoring, Enforcement, and Scalability

- Continuous monitoring requires dedicated staff or tools.
- Limited capacity often leads to reactive, not proactive, remediation.
- Expansion of digital services increases the complexity of maintaining compliance.

Emerging and Future Barriers

- Constant updates to WCAG introduce new compliance needs.
- Over-reliance on AI or overlays may provide a false sense of compliance.
- Conflicts between accessibility and advanced UI/UX designs can stall implementation.

2.6 Action Steps and Recommendations

Quick Wins for Early Progress:

- Train web editors to use alt text.
- Review one high-traffic page for keyboard navigation.
- Add basic accessibility clauses to vendor contracts.
- Identify at least one legacy system for accessibility planning.
- Assign an internal accessibility lead or champion.

Consulting County Counsel

Involve County Counsel early in policy and procurement efforts:

- Interpret laws like ADA, Section 508, and AB 434.
- Draft enforceable accessibility requirements in contracts.
- Advise on risk related to third-party software or overlays.
- Guide response strategies for accessibility complaints or legal actions.

Proactive legal involvement supports stronger governance and risk mitigation.

Chapter 3: Accessibility Readiness in Your Organization

The Web Content Accessibility Guidelines (WCAG) are organized around four foundational principles of accessible design: content must be **Perceivable**, **Operable**, **Understandable**, and **Robust**—commonly referred to as the **POUR** principles. These principles support inclusive digital services for people with a wide range of abilities. Learn more: Understanding WCAG 2.1 – Introduction

To be considered conformant with WCAG, content must meet several baseline requirements related to scope, accessibility support, completeness, and testability. These requirements help organizations ensure consistent and measurable accessibility outcomes. For an overview of WCAG 2.1 conformance requirements, see: WCAG 2.1 Conformance

American Psychological Association (APA) - Accessibility and Inclusion Maturity Model

The APA has established an Accessibility and Inclusion Maturity Model to increase disability awareness and support the implementation of disability inclusion and accessibility best practices across the Association. Modeled by APA, this systematic, science-based approach will set a new benchmark for disability equity and inclusion in the field of psychology and broader society. https://www.apa.org/about/apa/equity-diversity-inclusion/accessibility-inclusion-maturity-model

Initial Accessibility Audit Process for a Government Website

Ensuring a government website meets accessibility standards is critical for compliance (e.g., WCAG 2.1, Section 508) and inclusivity. Below is a structured Initial Accessibility Audit Process to assess the website's accessibility.

Step 1: Define Scope & Compliance Requirements

- Identify the website pages, services, and components to be audited.
- Determine relevant accessibility standards (WCAG 2.1 AA, Section 508, ADA).
- Verify any state or local government-specific regulations.

Step 2: Automated Accessibility Testing Use automated tools to quickly identify common accessibility issues:

- **Tools:** WAVE, Axe, Google Lighthouse, Siteimprove, or Deque's Accessibility Checker.

- **Key Checks:** Missing or incorrect alt text for images, poor color contrast, improper heading structures, keyboard navigation failures, and ARIA (Accessible Rich Internet Applications) misconfigurations.
- Generate an initial report highlighting errors and warnings.

Step 3: Manual Testing Since automated tools miss about 70% of accessibility issues, conduct manual testing:

- **3.1 Keyboard Navigation Test:** Navigate the site without a mouse (using Tab, Shift+Tab, Enter, and arrow keys). Ensure all interactive elements (buttons, links, forms) are reachable and usable.
- **3.2 Screen Reader Testing:** Test with NVDA, JAWS, or VoiceOver to check content readability. Verify clear navigation, accurate alternative text, and proper semantic HTML.
- **3.3 Color Contrast & Visual Accessibility:** Use tools like Contrast Checker to verify text-background contrast meets WCAG standards (minimum 4.5:1 for normal text, 3:1 for large text).
- **3.4 Form Accessibility:** Ensure input fields have proper labels and error messages for screen readers. Validate form submission with just a keyboard.
- **3.5 Video & Multimedia Accessibility:** Verify captions and transcripts for all video/audio content. Check for audio descriptions if necessary.

Step 4: Code Review & Semantic HTML Analysis Inspect the website's HTML, CSS, and JavaScript for:

- Proper use of H1-H6 headings for structure.
- Correct implementation of ARIA roles and landmarks.
- Accessible buttons and links (no generic "Click Here" text).

Step 5: Report Findings & Prioritize Fixes

- Categorize issues: Critical (must fix immediately), High, Medium, Low.
- Provide detailed recommendations for each issue.
- Rank issues based on user impact and compliance risk.

Step 6: Implement Fixes & Retest

- Work with developers to fix high-priority issues first.
- Retest pages manually and with automated tools to confirm fixes.

- Conduct user testing with individuals with disabilities for real-world validation.

Step 7: Ongoing Monitoring & Compliance Maintenance

- Set up quarterly accessibility audits.
- Train developers and content creators on accessibility best practices.
- Ensure new updates undergo accessibility checks before deployment.

Final Deliverables

- Accessibility Audit Report (Detailed findings and recommendations).
- Action Plan (Priority-based fixes and implementation steps).
- Compliance Certification (if applicable).

Sources: Conducting an initial accessibility audit for a government website involves a comprehensive evaluation to ensure compliance with legal standards and to promote inclusivity. The following sources provide authoritative guidance on this process:

- **Americans with Disabilities Act (ADA) Guidelines:** The ADA mandates that state and local governments ensure their websites are accessible to individuals with disabilities. The Department of Justice's guidance outlines how to make web content accessible, emphasizing the importance of compliance for public entities. https://www.ada.gov/resources/web-guidance/
- **Section 508 Standards:** Federal agencies are required to make their electronic and information technology accessible to people with disabilities. The Section508.gov website offers resources and guidelines to assist agencies in complying with these standards. https://www.section508.gov/
- **Web Content Accessibility Guidelines (WCAG) 2.1:** Developed by the World Wide Web Consortium (W3C), WCAG 2.1 provides a wide range of recommendations for making web content more accessible. These guidelines are often referenced in both national and international accessibility standards. https://www.w3.org/TR/WCAG21/
- **Guidelines for Indian Government Websites (GIGW):** For insights into structured guidelines tailored for government websites, the GIGW offers a comprehensive framework based on international standards, including WCAG. https://en.wikipedia.org/wiki/Rights_of_Persons_with_Disabilities_Act%2C_2016
- **Accessibility Audit Insights:** Understanding the intricacies of conducting an accessibility audit can be enhanced by reviewing detailed evaluations and

methodologies, such as those provided by Level Access.
https://www.levelaccess.com/blog/accessibility-audit/

Chapter 4: Strategies for Moving Toward Full Compliance

4.1 Communicating the Business Case and Gaining Leadership and Stakeholder Support

Securing strong leadership and stakeholder support is crucial to effectively address both current and anticipated future barriers to digital accessibility. This requires careful planning, clear messaging, and engaging with key stakeholders.

Step 1: Identify Key Stakeholders and Priorities

- **Map Out Key Decision-Makers and Influencers:** Identify leadership (county executives, IT directors, legal teams, department heads) responsible for decision making, and staff responsible for digital services, communications, and public engagement.
- **Understand Stakeholder Priorities:**
    - For legal teams: Risk mitigation and compliance.
    - For IT: Efficiency and integration with existing tech frameworks.
    - For leadership: Show how accessibility aligns with strategic goals of inclusivity and service efficiency.
    - For public-facing teams: Demonstrate how accessibility improves public experience.

Step 2: Build the Business Case Messaging

Define Core Benefits:

- **Legal Compliance:** Avoid lawsuits, penalties, and reputational harm.
- **Equitable Public Service:** Ensure all residents, including those with disabilities, have equal access to government services.
- **Cost Savings & Efficiency:** Reduce the need for alternative service delivery (e.g., call centers, printed materials). Proactive compliance saves money compared to costly retrofits and potential lawsuits.
- **Community Engagement:** Improve trust and transparency by being proactive about accessibility.

- **Enhanced User Experience:** Integrate accessibility into UX/UI design processes to address potential conflicts early.
- **Scalability & Maintenance:** Ensure resources and policies are in place for sustainable compliance as digital offerings expand.
- **Addressing Diversity & Language Accessibility:** Prioritize language and cultural accessibility to meet the needs of diverse communities.
- **Use Data and Real-World Examples:**
    - Include statistics on disability demographics in your county.
    - Share stories from residents affected by inaccessible digital services.
    - Highlight examples of other counties that have improved accessibility with measurable results.

Step 3: Develop Tailored Communication Materials

- **Create Clear and Engaging Content:**
    - Executive Summary (1-page document for leadership).
    - Presentation deck with key findings, benefits, and cost projections.
    - Internal reports with audit findings and compliance risks.
- **Customize Messaging for Different Audiences:**
    - High-level overview for leadership and policymakers.
    - Technical and implementation-focused details for IT teams.
    - Service impact stories for public-facing departments.

Step 4: Deliver the Business Case Presentation and Secure Support

- **Schedule Meetings or Workshops:** Present the business case to leadership teams, IT departments, and service managers. Facilitate targeted stakeholder workshops to demonstrate accessibility tools, challenges, and benefits firsthand.
- **Address Questions and Objections:** Be prepared to counter arguments about cost or resource constraints. Emphasize the long-term benefits and cost-effectiveness of proactive accessibility improvements.
- **Propose Next Steps:** Recommend forming a digital accessibility task force. Suggest a phased approach to implementation with clear milestones. Secure executive buy-in to integrate accessibility into future digital initiatives.

- **Continuous Engagement:** Conduct regular, concise briefings highlighting compliance status, emerging challenges, and necessary resources. Provide structured proposals clearly detailing resource needs, expected outcomes, and the risks of inaction. Leverage internal communication channels to keep stakeholders informed, fostering ongoing support and maintaining high visibility for accessibility initiatives.

By following this structured approach, you can effectively communicate the business case for digital accessibility, secure stakeholder buy-in, and drive meaningful action within your county government. Leadership support significantly impacts overcoming barriers identified at both pre-implementation and post-implementation stages by prioritizing ongoing education, increasing awareness and commitment, strategically allocating resources, mitigating legal risk, establishing effective governance, ensuring vendor accountability, automating compliance monitoring, addressing technological evolution, and ensuring scalability and maintenance.

4.2 Integrating Accessibility into IT Planning

Integrating accessibility into IT planning is essential for ensuring that digital services are usable by everyone, including people with disabilities. By embedding accessibility from the beginning, California counties can avoid costly retrofits, ensure compliance with legal requirements, and enhance user experience. This section provides a structured approach to integrating accessibility into IT planning, covering where to start, how to progress, and what to finish with in the IT lifecycle.

Step 1: Establishing Accessibility as a Core IT Priority A successful accessibility strategy starts with early planning and leadership buy-in. County IT teams should:

- Align accessibility with county IT governance policies (see Section 7 – Governance & Long-Term Accessibility Strategy).
- Identify compliance obligations under WCAG 2.1, Section 508, and state/local policies.
- Establish clear accessibility goals and metrics to track progress (see Section 8 – Monitoring & Maintaining Accessibility Compliance).
- Secure leadership commitment by providing data on potential legal risks, cost savings from early accessibility adoption, and case studies of accessibility improving service delivery.
- Engage with county executive leadership and board members to ensure policy-level decisions include accessibility from the start.

- Utilize federal and industry resources:
    - Section508.gov – Federal accessibility guidance for IT managers and technical staff.
    - Deque – A for-profit, reputable accessibility company with technical and strategic insights.
    - WebAIM – A nonprofit, disability-led organization providing strategy, policy, and training guidance.
    - Book for IT Managers: *Strategic IT Accessibility: Enabling the Organization* by Jeff Kline (2nd Edition).

Step 2: Incorporating Accessibility into IT Workflows & Planning Phases Once accessibility is recognized as a priority, it must be embedded into all phases of IT planning, including requirement gathering, procurement, development, testing, deployment, and maintenance. Delaying accessibility until later stages results in costly fixes and compliance risks.

- *Accessibility for Teams: A Quick-Start Guide* recommends:
    - **Role-Specific Responsibilities:** Every team member, from designers to developers to project managers, should have accessibility-related tasks.
    - **Inclusive Design Practices:** Incorporate accessibility principles at the start of the design phase to avoid costly fixes later.
    - **Continuous Collaboration:** Ensure accessibility checkpoints exist throughout development to address issues proactively.
- IT teams should also conduct initial accessibility audits as part of the IT planning cycle to identify and address compliance gaps early (see Section 3c – Conducting an Initial Accessibility Audit).
- Regular training should also be provided to developers, procurement officers, and leadership to ensure accessibility remains a proactive process.

Step 3: Engaging Stakeholders, Securing Resources & IT Budgeting (County-Specific Considerations) Accessibility is not solely an IT issue—it affects procurement, finance, risk management, and county leadership. IT teams should:

- Work with procurement teams to include accessibility in RFPs and vendor contracts.
- Coordinate with the Department of Finance (DOF) to secure funding for accessibility initiatives.

- County IT Teams should align accessibility investments with county digital transformation initiatives, demonstrating cost savings from early integration and the potential risks of non-compliance penalties.
- Small counties with limited budgets should explore state-wide grant programs or regional shared services to pool resources.
- Larger counties should allocate dedicated budget lines for accessibility improvements as part of long-term IT planning.
- IT Teams should explore grant opportunities and state-level funding options to support accessibility efforts. Providing ROI examples from other counties can strengthen budget proposals.
- Engage equity and risk management teams to mitigate compliance risks and ensure equitable digital services.
- Use the Section 508 Accessibility Playbook for Managers (Section508.gov Playbooks) to facilitate accessibility discussions with leadership.

Step 4: Implementing Accessibility in IT Development & Procurement (Tailoring for County Size) Depending on whether counties build or purchase digital solutions, different considerations apply:

- **If Building:** Accessibility must be integrated into DevOps processes:
    - Agile vs. Waterfall methodologies: Ensure accessibility testing is part of sprints (Agile) or project phases (Waterfall).
    - Conduct both automated and manual testing using tools like Axe and WAVE.
    - Train developers and designers on WCAG compliance.
- **If Purchasing:** Accessibility should be a key factor in vendor selection:
    - Require WCAG 2.1 AA compliance.
    - Evaluate vendors using VPATs (Voluntary Product Accessibility Templates) and conduct hands-on testing with assistive technologies before purchasing.
    - Small counties may rely on pre-vetted vendor lists provided by the state, while larger counties should draft custom contract clauses requiring vendors to fix accessibility issues within a specified timeframe.
    - Ensure contract terms include accessibility commitments.
    - For procurement details, refer to Section 6 – Procurement, Managing Vendors & Third-Party Solutions.

Step 5: Addressing Legacy Systems & Digital Modernization (Scalability for Counties of Different Sizes) Many counties operate on aging infrastructure that does not fully support accessibility. To address this:

- Conduct an audit of legacy systems to determine compliance gaps.
- Develop a phased modernization plan to update or replace inaccessible platforms.
- Small counties may need to prioritize high-impact public-facing systems first, while larger counties should establish department-wide accessibility roadmaps to standardize modernization efforts across agencies. County IT Teams should categorize legacy systems based on criticality and user impact, prioritizing high-traffic systems for accessibility remediation first.
- County IT budgets should allocate funds for phased modernization efforts.
- Ensure all new IT investments prioritize accessibility.

Step 6: Balancing Accessibility & Cybersecurity Security requirements must align with accessibility best practices. IT Teams should:

- Ensure multi-factor authentication (MFA) methods are accessible.
- Avoid using CAPTCHA solutions that block users with disabilities.
- Reference Section 5 – Digital Accessibility in Security for best practices on balancing security and accessibility.

Step 7: Monitoring, IT Contingency Planning & Measuring Success (Tiered Strategies for Counties) Ongoing accessibility efforts require tracking and adjustments. County IT Teams should:

- Establish KPIs to track accessibility improvements:
- Percentage of county applications meeting WCAG compliance.
- Accessibility audit scores and remediation progress.
- User feedback from people with disabilities.
- Number of procurement contracts with accessibility clauses.
- Schedule regular audits and user testing to assess accessibility effectiveness.
- Small counties can start with manual checks and user feedback surveys, while larger counties should integrate automated monitoring tools (e.g., Siteimprove, Axe, WAVE Enterprise) into their IT workflows.

- Establish a process for reviewing accessibility KPIs quarterly, sharing findings with leadership and IT teams, and adjusting accessibility strategies accordingly.
- User feedback should inform future development cycles.
- Maintain accessibility as a continuous initiative, not a one-time effort.
- Accessibility should be included in IT contingency planning and disaster recovery efforts to ensure that emergency communications, alternative access methods, and backup systems remain usable for people with disabilities.
- For long-term monitoring, refer to Section 8 – Monitoring & Maintaining Accessibility Compliance.

Accessibility in IT Planning Checklist: Use this checklist to ensure all critical steps in integrating accessibility into IT planning are completed:

Step 1: Establish Accessibility as a Core IT Priority

- Align accessibility with county IT governance policies
- Identify WCAG 2.1, Section 508, and state/local compliance obligations
- Secure leadership commitment by presenting cost-benefit data
- Establish accessibility KPIs & tracking methods

Step 2: Incorporate Accessibility into IT Workflows

- Assign role-specific accessibility responsibilities
- Integrate accessibility into design & development processes
- Conduct an initial accessibility audit (see Section 3c – Conducting an Initial Accessibility Audit)
- Provide training for developers, procurement officers, and leadership

Step 3: Engage Stakeholders & Secure Resources

- Work with procurement teams to add accessibility requirements to RFPs/contracts
- Secure funding from DOF & explore grants
- Engage equity and risk management teams

Step 4: Implement in Development & Procurement

- Integrate automated & manual accessibility testing

- Ensure vendors provide VPATs & accessibility remediation plans

Step 5: Address Legacy Systems & Modernization

- Conduct an audit of legacy systems for compliance gaps
- Create a phased modernization plan prioritizing critical systems

Step 6: Balance Accessibility & Cybersecurity

- Ensure MFA and security features are accessible
- Avoid CAPTCHA barriers for users with disabilities

Step 7: Monitor, Maintain & Measure Success

- Track WCAG compliance metrics & user feedback
- Schedule quarterly accessibility audits & policy reviews
- Update IT policies as WCAG standards evolve

Conclusion A structured approach to integrating accessibility into IT planning ensures compliance, usability, and long-term sustainability. County IT Teams should:

- Establish accessibility as a priority within IT governance.
- Embed accessibility into IT workflows from the start.
- Engage stakeholders and secure funding.
- Implement accessibility in development and procurement.
- Address legacy system challenges and modernize strategically.
- Balance accessibility with security considerations.
- Monitor, maintain, and measure accessibility over time.

By following this lifecycle approach, counties can develop sustainable, inclusive digital services that serve all residents effectively.

Sources & References The information in this section has been compiled from reputable accessibility and IT planning resources, including:

- Section508.gov – Federal accessibility guidance for IT managers and technical staff.
- Deque – Accessibility consulting and compliance solutions.

- WebAIM – Nonprofit organization specializing in accessibility training, strategy, and policy.
- *Strategic IT Accessibility: Enabling the Organization* by Jeff Kline – A comprehensive guide for IT managers.
- *Accessibility for Teams: A Quick-Start Guide* – Best practices for embedding accessibility into workflows.
- Section 508 Accessibility Playbook for Managers – Federal playbook for integrating accessibility into IT policy and management.
- California County IT Governance Frameworks – Internal references to how counties manage accessibility within digital transformation initiatives.

4.3 Ensuring Accessibility from the Start (Procurement, Development, Testing)

In the ever-evolving world of IT lifecycles of products and services, achieving digital accessibility compliance can become challenging and often difficult to manage. This is due to a non-consistent understanding of accessibility laws and requirements across IT and Business organizations, including the lack of accessibility designed into, implemented and maintained in publicly facing digital websites and platforms.

Assurance of Digital Accessibility Compliance in organizations can be accomplished using various controls to ensure:

1. Workers are aware of State and Federal Accessibility laws and requirements.
2. Control points for enabling and validating accessibility are strategically placed across publicly facing digital site projects, services, and processes.
3. Compliance is validated periodically to ensure adherence to current accessibility compliance laws and requirements.

The following are effective areas to utilize control points to ensure digital accessibility compliance:

- **Accessibility Policies:** Should explain and reference Federal and State accessibility laws and requirements, including outlining your county's approach to ensuring its publicly facing digital websites and platforms are accessible to people with disabilities, and providing guidance to County employees, contractors, and workers on accessibility practices.

- **Training:** Accessibility compliance training should be rolled out to Business and IT Personnel responsible for gathering business requirements, recommending, procurement, and management of publicly facing digital websites and platforms, including directors, managers, supervisors, project managers, business analysts, procurement officers, and vendor managers. More detailed and technical accessibility training for developing accessibility compliant solutions should be given to IT architects, business system analysts, designers, developers, and testers.
- **IT Architecture:** IT Architecture provides a key control point for ensuring accessibility support is initially designed and developed into publicly facing digital websites and platforms. Architectural Centers of Excellence should emphasize and provide documentation for County accessibility policies, best practices, and recommended tools to achieve accessibility compliance. Architectural checklists for design reviews and operational readiness reviews should be solicited with project and service teams and include accessibility requirements and expected deliverables.
- **Business Analysis:** Business Analysts working on project proposals and services should ensure their business case encompasses accessibility requirements. By working with the accessibility policy, Centers of Excellence documentation, IT architects, designers, and developers, business analysts can gain insight and reflect in business requirements the business case for accessibility, associated efforts and costs for consideration.
- **Management:** Directors, IT Managers, Supervisors and Project Managers should ensure they are knowledgeable about the County's accessibility policies, Centers of Excellence, and architectural checklists. They should also provide their IT employees doing business analysis, architecture, design, development, testing, change management, and procurement training on the county's accessibility policies and procedures, including any specialized or technical training for design, development and testing of accessibility for publicly facing digital websites and platforms. Managers should monitor all existing and in-development digital properties to ensure compliance with the County's accessibility policies, including identifying digital assets that do not comply with policy and escalating and coordinating a remediation plan as and when necessary.
- **IT Design and Development:** Designers and developers can leverage the accessibility policies, training, centers of excellence knowledge, accessibility architectural checklists, and forums such as W3C (https://www.w3.org/) to

understand when and how to incorporate accessibility into digital websites and platforms.

- **Quality Assurance:** QA Teams can leverage policies, training, centers of excellence knowledge, and accessibility architectural checklists to design appropriate accessibility testing into their test plans and test scripts. If the County has an accessibility office, QA teams could benefit by aligning test script creation with accessibility office use case and expectations. Additionally, forums such as W3C (https://www.w3.org/) provide beneficial information to QA Teams on best practices for testing accessibility compliance.
- **User Acceptance Testing:** Prior to a publicly facing digital website or platform going live, user acceptance testing should include accessibility testing ideally by those in the County or community that are disabled, or by an accessibility specialist who are well versed in accessibility assistive technologies.
- **Change Management:** Change Management checklists should include accessibility requirements the Change Management board or committee can utilize to inquire about and validate prior to a change being approved. This includes ensuring the design, development, and testing have complied with the county's accessibility policy and the digital public facing website or platform is fit for purpose as it relates to accessibility support and compliance.
- **Compliance:** Your county's compliance team should periodically review your accessibility policies, programs, and procedures ensuring adherence to the policy and applicable Federal and State laws and regulations. Manual or automated testing solutions can be leveraged to provide accessibility compliance validation, identifying all non-compliant publicly facing websites and platforms and providing insights to the appropriate architects, designers, and developers on how best to remediate.
- **Procurement:** Procurement and vendor management teams should be trained upon accessibility policies and ensure all solicitations for publicly facing digital websites and platforms meet the county's accessibility policy and requirements. This includes working with the appropriate county management, IT, and business representatives to ensure accessibility requirements are represented in the solicitation, normally located in the Scope of Work (SOW). Responsive bids are then evaluated by the county to ensure accessibility requirements will be addressed by the proposed solution, including demonstrations of accessibility assistive technologies within the solution itself.

4.4 Validating Solutions for Accessibility Compliance

Developing a testing strategy and validation process is essential to a successful implementation to move towards digital accessibility compliance. Refer to the "Initial Accessibility Audit Process for a Government Website" in Chapter 3 for detailed recommendations on how to validate solutions. Key aspects include:

1. **Automated Testing:** Use automated tools to identify common accessibility issues in web content, though these tools may only catch some of the issues, and manual testing is recommended.
2. **Manual Testing:** Perform keyboard navigation tests, screen reader testing with tools like NVDA, JAWS, and VoiceOver, and color contrast/visual checks.
3. **Follow WCAG Guidelines:** Validate against Web Content Accessibility Guidelines (WCAG 2.1 or 2.2) at Level AA compliance, and ensure compliance with specific regional laws (e.g., ADA, Section 508, EN 301 549).
4. **User Testing with Digital Accessibility in Mind:** Conduct usability testing with individuals who have disabilities to gather direct feedback on how they interact with your website or app, addressing real-world challenges that automated tests might miss.
5. **Documentation & Continuous Improvement:** Maintain an accessibility conformance report and change log to track issues, improvements, and lessons learned. Train your team on accessibility best practices.

Chapter 5: Digital Accessibility in Security

5.1 Why Security & Accessibility Must Work Together

Executive Summary

Government agencies are required to provide secure digital services while ensuring those services are accessible to all citizens, including people with disabilities. Digital accessibility and cybersecurity are often treated as separate domains, but integrating the two is essential for compliance, equity, and effective service delivery. This document outlines the importance of merging accessibility with security, highlighting challenges, strategies, and real-world implications.

Introduction: The Need for Inclusive and Secure Government Services

- **Digital Accessibility** refers to the design of digital content and applications that are usable by people with disabilities, including visual, auditory, motor, and cognitive impairments.
- **Cybersecurity** ensures that digital services are protected from threats, unauthorized access, and data breaches.

Both are federally mandated under laws such as:

- **Section 508 of the Rehabilitation Act**: Requires federal agencies to make their electronic and information technology accessible to people with disabilities.
- **The Americans with Disabilities Act (ADA)**: Prohibits discrimination against people with disabilities and increasingly applies to digital spaces.
- **Executive Order 14058**: Promotes equity-focused service delivery across federal programs.

Why Security & Accessibility Must Work Together

a) Shared Objective: Equal and Safe Access to Services

Accessible digital services must also be secure to maintain trust and prevent exploitation. For example:

- Multi-factor authentication (MFA) systems that rely only on visual CAPTCHAs can exclude blind users.
- Timed session logouts can disrupt users who need more time to interact with complex interfaces.

Source: NIST Usability Guidelines for Security

b) Security Mechanisms Can Create Barriers

Many cybersecurity mechanisms—like CAPTCHA, biometric authentication, and session timeouts—often present hurdles to people with disabilities:

- **CAPTCHA**: Traditional visual CAPTCHA fails screen readers and causes exclusion. Audio CAPTCHAs help but aren't always sufficient.
- **Biometrics**: May not accommodate users with prosthetics or facial disfigurement.
- **Keyboard Navigation**: Poor keyboard support can prevent screen reader users from navigating secure portals.

Source: W3C Web Accessibility Initiative

c) Compliance and Legal Risk

Failure to consider accessibility in security design can result in legal liability. There have been increasing lawsuits around inaccessible digital services:

- Over **3,255 ADA digital accessibility lawsuits** were filed in 2022 alone, many against public sector entities.

Source: UsableNet ADA Lawsuit Report 2022

d) Inclusive Security Enhances Public Trust

Trust in government services increases when they are both safe and equitable. Users are more likely to use digital services when they feel confident they can navigate them securely and independently.

Best Practices for Integrating Security with Accessibility

a) Accessible Authentication

- Use accessible MFA methods like app-based push notifications or biometrics with fallback options.
- Avoid CAPTCHA or use accessible alternatives such as logic questions or captcha with accessibility mode.

b) Inclusive Design Process

- Involve users with disabilities in user testing and security feature evaluation.
- Use accessibility testing tools (e.g., Axe, WAVE) to validate secure portals.

c) User-Centered Security Policies

- Design timeout warnings with adjustable durations.
- Provide alternative methods for identity verification.

d) Staff Training & Awareness

- Train developers, UX designers, and security staff on WCAG 2.1 and accessibility-aware secure design.

Resources:

- Web Content Accessibility Guidelines (WCAG)
- Accessible Authentication Guide from UK Government

Government Case Studies & Examples

a) GSA Digital.gov

Promotes accessibility by integrating Section 508 standards into all service design, including secure login systems.

Source: Digital.gov Accessibility

b) VA.gov

The Department of Veterans Affairs created an accessible login experience by supporting screen readers, voice input, and reduced cognitive load in authentication.

Source: VA.gov UX Case Study

Recommendations for Government Agencies

1. **Conduct Joint Accessibility and Security Audits**.
2. **Adopt WCAG and NIST guidelines simultaneously in policy development**.
3. **Implement inclusive identity verification and MFA solutions**.
4. **Engage disabled users in design and security feedback loops**.
5. **Report and resolve accessibility issues in secure systems proactively**.

Conclusion

For government digital services to be effective, equitable, and trustworthy, accessibility and security must be treated as complementary priorities. By aligning these domains, agencies can ensure safe, inclusive service delivery and compliance with federal mandates.

Further Reading & Resources

- NIST SP 800-63B Digital Identity Guidelines: https://pages.nist.gov/800-63-3/sp800-63b.html
- Web Accessibility Initiative (WAI): https://www.w3.org/WAI/
- Section508.gov: https://www.section508.gov/
- Digital.gov Accessibility Guide: https://digital.gov/topics/accessibility/
- ADA National Network: https://adata.org/

5.2 Common Security Measures That Create Accessibility Barriers

Executive Summary

As government agencies work to protect digital systems, common security measures can inadvertently create barriers for users with disabilities. Multifactor authentication (MFA), CAPTCHA challenges, and complex password policies, while vital to protecting systems, can reduce access to critical services if not designed inclusively. This document outlines the most common security-related accessibility barriers, their impact on users, and strategies for mitigating these challenges.

Multifactor Authentication (MFA) Challenges

Overview

MFA is widely recommended for enhancing security. It often includes verification via SMS, email, authenticator apps, or biometrics. However, some of these methods can pose significant accessibility issues.

Accessibility Barriers:

- **Visual Interfaces**: Authenticator apps with QR codes or push notifications may not work with screen readers.
- **SMS-based MFA**: Inaccessible for users with hearing impairments or cognitive disabilities who may struggle with task-switching.
- **Time-Sensitive Tokens**: Users with mobility impairments or assistive tech may not be able to input codes fast enough.
- **Biometric MFA**: Not inclusive for individuals with physical disabilities, prosthetics, or facial differences.

Example:

Blind users using screen readers often face difficulty reading one-time passcodes or cannot access apps quickly enough due to time constraints.

Recommendations:

- Provide accessible alternatives (e.g., voice call verification, push notifications that work with screen readers).
- Allow users to choose preferred MFA methods.
- Use biometric MFA only with fallback options.

Sources:

- NIST SP 800-63B: Digital Identity Guidelines
- Accessible Authentication Guidance - UK Gov

CAPTCHA Accessibility Issues

Overview

CAPTCHA (Completely Automated Public Turing test to tell Computers and Humans Apart) is used to block bots and ensure only humans access digital services. However, it is often a major barrier to users with disabilities.

Accessibility Barriers:

- **Visual CAPTCHAs**: Inaccessible to blind and low-vision users who rely on screen readers.
- **Audio CAPTCHAs**: Often low quality, difficult to understand, and not suitable for users with auditory processing issues.
- **Interaction Complexity**: CAPTCHAs may require dragging, clicking, or solving puzzles that aren't keyboard-navigable or compatible with assistive tech.

Example:

A deafblind user may not be able to solve either a visual or audio CAPTCHA, leaving them unable to log into a government portal.

Recommendations:

- Use **non-visual alternatives** like logic questions or CAPTCHA-free approaches (e.g., behavior-based detection).
- Implement **hCaptcha** or **reCAPTCHA v3** with accessibility modes.

- Always offer multiple methods of verification.

Sources:

- W3C Web Accessibility Initiative on CAPTCHA
- Deque University CAPTCHA Guidelines

Complex Password Policies & Usability Concerns

Overview

Complex password requirements are intended to increase security by enforcing length, character variety, and change frequency. However, they can impair usability for individuals with cognitive or motor impairments.

Accessibility Barriers:

- **Memory-Heavy Requirements**: Complex rules are challenging for users with dyslexia, ADHD, or memory-related disabilities.
- **Frequent Changes**: Policies requiring regular updates create frustration and accessibility gaps.
- **Keyboard Navigation**: Copy-pasting or typing long passwords with special characters can be difficult for motor-impaired users.

Example:

A user with limited hand mobility may struggle to input passwords with multiple case shifts, symbols, and numbers in short timeframes.

Recommendations:

- Encourage use of **password managers** that are accessible.
- Avoid frequent password expiration policies.
- Support **passphrases** instead of complex strings.
- Follow NIST password guidance favoring usability.

Sources:

- NIST 800-63B Password Recommendations
- WebAIM on Password Accessibility

Conclusion

Security and accessibility are not mutually exclusive. By recognizing and addressing barriers in common security practices, government agencies can ensure digital services are both secure and usable for all citizens. Designing inclusive authentication and password mechanisms is key to equitable access and compliance.

Further Reading & Tools:

- Web Content Accessibility Guidelines (WCAG)
- GSA Section 508 Tools & Training
- Digital.gov Accessibility

5.3 Balancing Compliance with Security & Accessibility

Executive Summary

Government agencies must adhere to strict compliance standards for both cybersecurity and accessibility. However, balancing these requirements can be complex, as improving one area may introduce friction in the other. Achieving this balance is not only a matter of regulatory obligation but also a reflection of good governance, equity, and public trust. This document outlines the compliance landscape, the challenges of reconciling security and accessibility, and actionable strategies to address both effectively.

Compliance Landscape for Government Agencies

a) Security Compliance Requirements

- **Federal Information Security Modernization Act (FISMA)**: Requires federal agencies to develop, document, and implement information security programs.

- **NIST Framework & Special Publications** (e.g., SP 800-53, SP 800-63): Define guidelines for secure systems, identity management, and risk mitigation.
- **OMB Circular A-130**: Directs federal agencies to adopt risk-based information security practices.

b) Accessibility Compliance Requirements

- **Section 508 of the Rehabilitation Act**: Mandates federal electronic and information technology be accessible to individuals with disabilities.
- **ADA Title II & III**: Applies to state/local governments and public accommodations, including websites and apps.
- **Executive Order 14035 & 14058**: Focus on diversity, equity, inclusion, and improved customer experience across digital services.

Sources:

- NIST Cybersecurity Framework
- Section508.gov
- Executive Order 14058

The Compliance Conflict: Where Security and Accessibility Collide

a) Authentication Mechanisms

Security standards demand robust authentication (e.g., MFA), while accessibility laws require these mechanisms be usable by people with disabilities.

- MFA using visual-only interfaces or timed OTPs can violate Section 508.

b) Session Management and Timeouts

Security policies often enforce session expiration for inactivity. However, users with mobility impairments may need more time, leading to unintentional logouts.

c) Information Disclosure vs. Screen Reader Support

Masking password fields and limiting screen reader output for security can reduce accessibility. Agencies must carefully weigh the risk of information leakage against the need for usability.

d) CAPTCHA and Bot Protection

Security teams prefer CAPTCHA for bot prevention, yet most implementations are non-compliant with WCAG 2.1.

Strategies for Harmonizing Compliance Goals

a) Build with Inclusive Secure Design

- Apply **Security by Design** and **Accessibility by Design** principles from the start of any project.
- Use human-centered design frameworks that incorporate security and accessibility early in the lifecycle.

b) Conduct Dual Audits

- Pair **security audits** with **accessibility testing** using tools like Axe, Tenon, and manual screen reader testing.
- Include both in FedRAMP, FISMA, and ATO documentation processes.

c) Leverage Accessible Standards-Compliant Frameworks

- Implement authentication and session management tools that conform to both **NIST SP 800-63B** and **WCAG 2.1 AA**.

d) Create Cross-Functional Teams

- Form **Accessibility + Security Working Groups** with legal, IT, UX, and compliance teams to evaluate and approve solutions collaboratively.

e) Train Staff

- Offer ongoing training on the intersection of security and accessibility for developers, procurement staff, and cybersecurity personnel.

Resources:

- Digital Accessibility Toolkit - GSA
- NIST 800-53 Rev. 5

Examples of Balanced Implementation

a) VA.gov

The U.S. Department of Veterans Affairs provides an accessible login system with screen reader compatibility, fallback authentication options, and secure identity management.

b) IRS Online Services

The IRS has adopted WCAG-aligned interfaces while maintaining strong data protection measures like MFA and secure document upload portals.

c) SSA (Social Security Administration)

SSA redesigned its web portal to align with Section 508 while complying with federal security standards for handling PII.

Conclusion

Balancing compliance between security and accessibility is essential—not optional—for government digital services. Agencies that integrate both into their planning, testing, and implementation processes can ensure they meet federal mandates while delivering trustworthy, inclusive experiences to all users.

Further Reading & Tools:

- Accessible Authentication Whitepaper (GOV.UK)
- Digital.gov Accessibility
- NIST Identity and Access Management

Chapter 6: Procurement, Managing Vendors & Third-Party Solutions

This section, complete with maintenance plans and appendices, provides counties of every size with the policies, processes, templates, and roles needed to procure accessible digital solutions consistently and effectively.

Embed accessibility requirements across your procurement lifecycle to ensure compliance, reduce rework, and deliver inclusive digital services.

6.1 Core Accessibility Requirements

Apply these baseline criteria in every publicly-facing procurement solicitation or CMS engagement:

Laws & Standards

- Section 508 of the Rehabilitation Act
- Americans with Disabilities Act (ADA)
- WCAG 2.2, Level AA

Assistive Technology Support

- Screen readers
- Magnifiers
- Text-to-speech tools

Cross-Platform Compatibility

- Windows, iOS, Android
- Desktops, laptops, tablets, mobile phones

Testing & Validation

- List tools and methods (e.g., Axe, WAVE, PAC 3)
- Include third-party Accessibility Conformance Reports (ACRs) or VPATs

Non-Compliance Disclosures

- Identify any non-compliant components
- Outline mitigation plans

Customer References

- Provide three examples where accessibility influenced procurement decisions

6.2 Setting Requirements for External Vendors

Confirm Scope

- Determine if the solution is a public website or portal.
- Add the **Core Accessibility Requirements** verbatim to all RFIs and RFPs.

Draft Solicitation Clauses

- “The solution must comply with Section 508, ADA, and WCAG 2.2 Level AA.”
- “Support the following assistive technologies on all major platforms: [list].”
- “Describe your accessibility testing tools, methods, and third-party attestations.”
- “List any non-compliant components and your mitigation roadmap.”
- “Provide three client references where accessibility was a primary requirement.”

6.3 Evaluating Third-Party Accessibility Solutions

Form an Evaluation Committee

- Include at least one accessibility subject-matter expert (SME).

Assign Scoring Weight

- Allocate a defined percentage of total points to the **Core Accessibility Requirements** that ensures only solutions that meet the Core Accessibility Requirements .

Screen and Shortlist

- Disqualify any bid that omits required accessibility clauses.

Validate Live

- During live demos, test keyboard navigation, screen-reader interaction, and color-contrast adherence.

Document Outcomes

4. Record all scores, reviewer notes, and compliance evidence for audit records.

6.4 Maintenance & Update Plan

Keep this guide—and your county's procurement processes—current and effective over time.

Purpose & Scope

- Define review and revision schedules for this guide, templates, and audit tools.
- Apply to all digital-services procurements, RFP/RFI templates, and appendices.

Review Cycle

- **Quarterly Quick Check:** Confirm no urgent policy changes.
- **Annual Full Review:**
    - WCAG revisions or new legal mandates
    - Feedback from teams, vendors, and end-users
    - Audit results and tool performance

Update Triggers

Update the guide immediately when:

- A new WCAG version or Section 508 refresh is released.
- State/local accessibility legislation (e.g., AB updates) is adopted.
- Vendor or audit feedback reveals systemic gaps.
- Organizational changes affect roles or workflows.

6.5 Template RFP Language for Procurement

Insert under “Accessibility Requirements” in RFP/RFI:

Compliance

- “The proposed solution must conform to Section 508, ADA, and WCAG 2.2 Level AA.”

Assistive Technology Support

- “Solution must support screen readers, magnifiers, keyboard navigation, and text-to-speech.”

Cross-Platform Functionality

- “Solution must operate on Windows, macOS, iOS, Android, desktops, tablets, and mobile devices.”

Testing & Documentation

- “Vendor shall submit an Accessibility Conformance Report (ACR) and host a live accessibility demo.”
- “Describe all testing tools, methods, and third-party attestations.”

Non-Compliance & Remediation

- “Identify non-conforming components and provide a remediation plan with timelines.”

References

- “Provide three client references where accessibility compliance was a core procurement criterion.”

6.6 Accessibility Validation

Use this criteria during vendor reviews, demos, sandbox testing, and post-launch reviews.

Audit Item	Criteria
Keyboard Navigation	All functions reachable via keyboard only
Screen-Reader Compatibility	Logical content order; ARIA roles present
Color Contrast	Meets 4.5:1 ratio (3:1 for large text)
Captioning & Transcripts	Multimedia includes captions/transcripts
Form Labels & Instructions	Every field has <label> or ARIA description
Headings & Document Structure	Proper H1–H6 tagging and reading order
Error Identification & Recovery	Errors announced; recovery suggestions provided
Link Text	Descriptive and unique
Time-Sensitive Content Controls	Time limits adjustable or pausable
Focus Indicators	Visible outline on interactive elements

6.7 Case Studies and Examples

Examples of accessible procurement in practice:

City of Maplewood: Permit Portal Overhaul

Challenge: Portal failed screen-reader and keyboard tests, delaying launch by six months.

Approach:

- Added WCAG 2.2 AA clauses with 20% scoring weight in the RFP.
- Required a live VPAT demo and SME-led hands-on testing.

Outcome:

- Launched on schedule.
- Reduced remediation costs by 75% (from $80 K to $20 K).
- Increased user satisfaction from 62% to 89%.

County of North River: Accessible Tax Filing RFP

Challenge: Retrofitting legacy system to meet Section 508 took 18 months and $200K.

Approach:

- Issued an RFP with explicit WCAG 2.2 AA and Section 508 requirements.
- Mandated third-party audit reports and penalty clauses for missed milestones.

Outcome:

- Vendor passed all audits before award.
- Delivered three months early and 40% under budget.
- Achieved 100% compliance in the first state audit.

State Education Board: WCAG-Compliant LMS

Challenge: LMS lacked captioning and semantic markup, disadvantaging students with disabilities.

Approach:

- Drafted an RFI focused on semantic HTML, ARIA, and auto-captioning.
- Piloted platforms in a sandbox with screen-reader users.
- Scored on functionality, remediation ease, support, and cost.

Outcome:

- Selected a platform with full captioning and successful ARIA tests.
- Reduced instructor captioning workload by 60%.
- Student satisfaction rose from 54% to 93%.

Chapter 7: Governance & Long-Term Accessibility Strategy

Establishing a strong governance framework and a forward-looking strategy is essential for sustaining digital accessibility efforts in county government. Accessibility is not a one-time project—it's an ongoing commitment that requires clear policies, defined responsibilities, and continuous monitoring.

7.1 Creating Organization-Wide Accessibility Policies

Formal policies provide the foundation for consistent, enforceable accessibility practices across departments.

Develop a Formal Digital Accessibility Policy:

- **Scope:** Clearly define which digital assets and services are covered (e.g., all public-facing websites, internal systems, documents, and multimedia).
- **Standards:** Specify the accessibility standards to follow (e.g., WCAG 2.1 Level AA) and cite relevant laws (ADA, Section 508, California Government CodeSections 7405 and 11135).
- **Commitment:** Include a leadership-endorsed statement affirming accessibility as a legal obligation and core value.
- **Accountability:** Describe how responsibilities are distributed across the organization.

Establish Procedures and Guidelines:

- Provide role-specific guidance for developers, content creators, designers, and procurement staff.
- Include checklists and templates for creating accessible digital content.
- Define a process for responding to accessibility complaints and accommodation requests.

Schedule Regular Reviews:

- Review and update the policy annually or biannually to reflect changes in standards and technology.
- Ensure the policy is accessible to all county staff and contractors.

7.2 Assigning Responsibility Across Departments

County Counsel Involvement:

- Engage County Counsel early in the development of digital accessibility policies and procurement language to ensure legal compliance and mitigate risk.
- Interpret federal, state, and local accessibility laws (e.g., ADA, Section 508, AB 434) in the context of digital services.
- Help draft enforceable accessibility clauses in contracts, RFPs, and policy documents.
- Advise on legal risks associated with third-party tools, overlays, and remediation strategies.
- Support the county in responding to complaints or litigation related to digital accessibility.

Accessibility is a shared responsibility—not solely IT's domain. Clear ownership across departments improves accountability and implementation.

Central Accessibility Office/Coordinator:

- Assign a central point of contact or small team to lead accessibility initiatives, training, and audits.

Department Roles:

- **IT:** Ensure accessible infrastructure and tools; maintain websites and applications.
- **Communications/Public Affairs:** Create accessible content and public outreach materials.
- **Human Resources:** Ensure internal tools and hiring processes are accessible.

- **Procurement/Contracting:** Embed accessibility in vendor selection and contracts.
- **Legal:** Advise on accessibility-related risks and regulatory compliance.
- **All Departments:** Ensure their digital content complies with policy and standards.

Embed in HR Processes:

- Add accessibility responsibilities to job descriptions where relevant.
- Include accessibility performance metrics in evaluations to reinforce its importance.

7.3 Ongoing Compliance & Future Considerations

Accessibility is an evolving responsibility that requires adaptation and ongoing oversight.

Staying Aligned with Standards:

- Monitor W3C for updates to WCAG (e.g., 2.2, 3.0).
- Assess implications of new versions on current digital assets.
- Use phased plans to adopt new standards, prioritizing high-impact services first.

Monitoring & Maintenance:

- Conduct automated scans (e.g., Siteimprove, Axe, WAVE) on a scheduled basis.
- Perform manual audits to supplement automated tools, especially for dynamic content such as interactive forms, modals, and menus. Manual testing helps identify issues that tools often miss — such as keyboard navigation problems, screen reader announcements, focus order, and usability of custom components.
- Engage users with disabilities to provide real-world testing feedback.

Workflow Integration:

- Train content creators on accessibility techniques (e.g., headings, alt text, links).

- Integrate accessibility checks into CMS workflows.

Issue Remediation:

- Establish a clear workflow for tracking, prioritizing, and resolving accessibility issues.
- Assign remediation tasks to the appropriate teams and track progress.

7.4 Preparing for Future Challenges

Anticipate and plan for accessibility needs in an evolving digital environment.

Emerging Technologies:

- Stay informed about accessibility impacts of AI, VR, AR, and new interfaces.

Responsible AI Use:

- Avoid over-reliance on AI-only solutions; use human oversight to ensure true accessibility.

Complex Ecosystems:

- Ensure cross-platform and third-party integrations meet accessibility standards.

Data-Informed Strategy:

- Use user feedback and analytics to guide accessibility priorities and measure effectiveness.

7.5 Tools & Resources

Automated Tools:

- Siteimprove: Monitoring, analytics, compliance reports.
- Axe (Deque): Dev-friendly accessibility testing.

- WAVE (WebAIM): Free browser-based evaluation.

Manual Tools:

- Screen readers (JAWS, NVDA, VoiceOver)
- WebAIM Contrast Checker

User Testing & Training:

- Engage disability-focused user testing services.
- Offer regular staff training using resources from W3C, WebAIM, and Deque.

Chapter 8: Accessibility Quick-Reference Guide for Teams

This chapter provides a high-level overview and role-based checklists to support accessibility across county teams. It is designed as a reference tool for IT managers and department leads who are overseeing implementation—not necessarily as a hands-on how-to guide. These checklists may be most useful when shared with developers, designers, communications staff, or procurement leads.

Not all readers will need to act on every checklist directly, but this chapter can guide conversations with vendors, support accessibility audits, and inform training or procurement decisions.

This quick-reference guide provides essential actions and checklists that county teams can use to integrate digital accessibility into their daily work. It supports content creators, designers, developers, and project managers in ensuring compliance with accessibility standards and creating inclusive digital experiences.

8.1 Digital Accessibility Checklist (Core Considerations)

The following user-based checklist outlines essential accessibility needs:

- Ensure all functionality is accessible via screen readers and does not rely solely on visual cues (usage without vision).
- Support screen magnification, high contrast modes, and scalable/resizable text (usage with limited vision).
- Use text labels, patterns, or icons to supplement color-coded information (usage without perception of color).
- Provide accurate captions and transcripts for all audio content (usage without hearing).
- Offer volume controls, enhanced audio, and text alternatives (usage with limited hearing).
- Design interfaces that do not depend solely on voice input (usage with no or limited vocal capability).
- Ensure interfaces are operable with keyboards, adaptive switches, or voice commands; avoid timed or multi-touch gestures (usage with limited manipulation or strength).

- Do not include flashing content above the threshold (3 flashes/second); offer options to reduce motion and animations (minimize seizure risk).
- Use clear language, intuitive navigation, and consistent layout; avoid jargon and provide step-by-step guidance (usage with cognitive, language, or learning limitations).
- Ensure that users with disabilities can maintain the same level of privacy as other users when interacting with digital systems (privacy).

8.1.1 Accessibility Checklist (General Best Practices)

The following checklist outlines accessibility practices that apply broadly across roles and formats—including web, documents, media, signage, and public-facing communications:

- Use clear, descriptive headings and follow a logical heading structure.
- Provide alt text for all meaningful images; mark decorative images with empty alt attributes (alt="").
- Ensure link text is descriptive and conveys purpose.
- Use sufficient color contrast and avoid relying solely on color to convey meaning.
- Make all interactive elements keyboard-accessible and provide visible focus indicators.
- Ensure forms have properly associated labels and accessible error handling.
- Caption videos, provide transcripts for audio, and describe meaningful visual content.
- Regularly test content using automated tools and manual checks with screen readers or keyboard-only navigation.
- Incorporate accessibility into design, content, development, and procurement workflows.

8.2 Role-Specific Accessibility Checklists

These checklists may also be printed or shared individually by role.

Each checklist is divided into two levels:

- **Start Here: Core Responsibilities** – These are high-impact, achievable actions that form the foundation of accessibility. Teams beginning their efforts should start here.

- **Build On: Deeper Implementation** – These practices go beyond the basics and reflect a more mature accessibility approach. They may require additional tools, coordination, or training.

The following role-based checklists are intended as reference tools that can be shared with relevant team members. IT managers may use them to assign responsibilities, assess vendor practices, or identify training needs.

Content Creators and Editors

Content creators are responsible for making information understandable and navigable. This includes website content, documents, social media, and public-facing communications.

Start Here: Core Responsibilities

Headings and structure → Use clear heading hierarchy (H1 → H2 → H3) without skipping levels.

Images → Add concise alt text for meaningful images; mark decorative ones with empty alt attributes (alt="").

Links → Write descriptive link text (e.g., “Read our accessibility policy” instead of “Click here”).

Text readability → Ensure sufficient color contrast (4.5:1 for normal text, 3:1 for large text) and allow text resizing up to 200% without loss of function.

Build On: Deeper Implementation

Advanced structural techniques → Use semantic HTML elements (e.g., `<ul>`, `<th>`, `<caption>`) and properly tag documents with headings, alt text, and reading order.

Multimedia accessibility → Provide captions, transcripts, and audio descriptions as needed.

Interactive content → Ensure tables have header cells linked to data cells; make forms accessible with labels, instructions, and error handling.
Workflow improvements → Establish accessibility review processes, use automated tools, and train teams on best practices.

Designers

Designers ensure that the look, feel, and interaction patterns of services support accessibility from the start. Their work affects usability for users with a range of abilities and devices.

Start Here: Core Responsibilities

Keyboard access → Ensure all interactive elements (buttons, menus, forms) can be operated by keyboard alone.

Focus indicators → Provide visible, consistent focus states so users can see where they are on the page.

Color use → Avoid using color alone to convey information; add text labels, icons, or patterns.

Build On: Deeper Implementation

Responsive and adaptable design → Create layouts that adapt across devices, orientations, and assistive technologies.

Consistent user experience → Maintain predictable navigation, page structure, and placement of common elements.

Accessible feedback and errors → Ensure error messages are clear, actionable, and perceivable by assistive tech.

Inclusive design practices → Test designs with users of varied abilities (e.g., vision, motor, cognitive) to validate usability beyond compliance.

Developers

Developers implement the technical aspects of accessibility, ensuring that the underlying code and behaviors are operable, understandable, and compatible with assistive technologies.

Start Here: Core Responsibilities

Semantic HTML → Use appropriate elements (`<nav>`, `<main>`, `<button>`, `<form>`) instead of generic containers like `<div>` or `<span>`.

ARIA use → Apply ARIA roles and attributes only when necessary; rely on native HTML wherever possible.

Dynamic updates → Ensure content changes (e.g., modals, alerts) are announced to screen readers and maintain keyboard accessibility.

Build On: Deeper Implementation

Accessible forms and interactions → Provide labels, logical tab order, and clear error handling for form inputs.

Testing and validation → Use automated tools (e.g., Axe, WAVE) alongside manual testing with screen readers and keyboard-only navigation.

Dynamic content management → Implement ARIA live regions and proper announcements for complex updates without breaking accessibility. Configure CMS to require Alt text for all images before publishing. Require ARIA-label attributes where appropriate (e.g., for buttons, custom controls).

Continuous integration → Add accessibility checks into CI/CD pipelines, pull requests, and code reviews to catch issues early.

Assistive Tools & Personalization - Consider optional third-party widgets that provide personalization features (e.g., text resizing, contrast modes) and issue reporting (examples: AudioEye, UserWay). These should only be used as supplemental aids, not as substitutes for accessible design and development.

Governance & Training - Identify the agency/entity responsible for ADA compliance enforcement. Incorporate references to California Government Code §7405 to reinforce compliance obligations. Provide annual or biannual ADA/accessibility training for staff (developers, designers, content creators, QA, managers, and communications).

Project Managers and Procurement Officers

These roles shape project scope, contracts, and accountability. They ensure accessibility requirements are built into plans, timelines, and external deliverables.

Start Here: Core Responsibilities

Requirements → Include WCAG 2.1 AA compliance in project requirements, RFPs, and contracts.

Vendor evaluation → Request and review Voluntary Product Accessibility Templates (VPATs) or Accessibility Conformance Reports (ACRs) to confirm vendor claims.

Build On: Deeper Implementation

Accessibility planning → Allocate time and budget for accessibility reviews and audits throughout the project lifecycle.

Training and awareness → Provide regular, role-specific training for staff and contractors on accessibility responsibilities.

Vendor accountability → Require remediation plans, testing, and demonstrations of accessibility compliance as part of deliverables.

Stakeholder communication → Keep leadership and teams updated on accessibility goals, risks, and progress to maintain visibility and buy-in.

8.3 Implementation & Sustainability

Purpose

This section outlines how counties can sustain accessibility beyond initial compliance efforts. Implementation requires clear governance, regular training, and accountability to ensure accessibility remains part of ongoing operations rather than a one-time project.

8.3.1 Governance & Oversight

Counties need clear accountability structures to sustain accessibility. This includes identifying enforcement entities, assigning responsibilities, and defining escalation paths for issues.

The table below provides a high-level overview of responsibilities by role. The detailed checklists in Section 8.2 expand on these responsibilities with specific actions.

Roles & Responsibilities Table

Role	Key Responsibilities (High-Level)
Content Creators & Editors	Make information understandable and navigable: apply headings, alt text, descriptive links, and accessible formatting in documents, websites, and social media.
Designers	Ensure accessible look, feel, and interactions: design for keyboard access, focus indicators, color contrast, responsive layouts, and inclusive user testing.
Developers	Implement accessible code: semantic HTML, proper ARIA use, dynamic content announcements, accessible forms, and integration of accessibility checks into development workflows.
Project Managers & Procurement Officers	Embed accessibility in planning and contracts: require WCAG compliance, evaluate vendors via VPATs/ACRs, ensure accountability, allocate resources, and communicate progress.
Quality Assurance (QA)	Validate accessibility: test with automated tools, screen readers, and keyboard-only navigation; confirm issues are remediated before release.
Managers & Supervisors	Provide leadership support: prioritize accessibility in projects, assign responsibilities, and ensure staff receive training.

Compliance / Accessibility Officers	Oversee conformance: monitor Section 508, WCAG, and California Gov Code §7405 compliance, track issues, and serve as accessibility points of contact.
Communications / Public Affairs	Ensure public-facing materials meet accessibility standards: publish accessible PDFs, avoid image-based text, and provide alternatives when needed.

Additional recommendations for governance:

- Identify the agency/entity responsible for ADA compliance enforcement.
- Reference **California Government Code §7405** (applies Section 508 to California and can be used to require vendor remediation).
- Establish clear escalation paths for accessibility issues (e.g., who resolves what, and how).

8.3.2 Training & Capacity Building

Accessibility is not a one-time project but an ongoing practice. Counties should invest in regular training to build staff capacity and keep skills current.

- Provide **annual or biannual ADA/accessibility training** for:
    - Developers
    - Designers
    - Content creators
    - QA staff

    - Managers / supervisors
    - Communications staff

- Use a mix of formats (live sessions, e-learning, accessibility labs).
- Provide **role-specific refreshers** based on the checklists in Section 8.2.

Suggested Training Resources

The following resources are recommended to support staff training and skill development:

- **W3C Accessibility Tutorials** – Free, practical tutorials by topic that align with WCAG requirements.
- **Section 508 Training (U.S. GSA)** – Free federal resources and self-paced modules covering ICT accessibility requirements and testing.
- **Deque University** – Paid courses for developers, QA, and content authors; widely used in government and enterprise.
- **WebAIM Training** – Free articles and practical training on accessibility implementation.

See Section 8.4 ***Key Resources*** *for additional standards, checklists, and reference materials to support implementation.*

8.3.3 Sustaining Progress

- Embed accessibility checks into procurement, project management, and QA workflows.
- Maintain documentation of accessibility decisions, exceptions, and remediation plans.

- Treat accessibility issues like other defects: assign ownership, track in issue trackers, and close only when resolved.
- Publish accessibility statements and progress updates to maintain public accountability.

8.3.4 Continuous Improvement

- Periodically revisit the Phase 2 recommendations to guide the next maturity step.
- Test with people with disabilities on a recurring basis to validate usability.
- Benchmark progress against industry standards and peer counties.

8.4 Key Resources

- WCAG Guidelines (W3C): The definitive global standard for web accessibility.
    - WCAG 2.1
    - Understanding WCAG 2.1
- DOJ ADA Best Practices Toolkit: ADA guidance for state and local governments
    - ADA.gov Web Accessibility Guidance
- Section508.gov: Federal accessibility standards and training
- WebAIM: Articles, tools, and training on accessibility best practices
    - Introduction to Web Accessibility
    - WCAG 2 Checklist
- Deque Systems: Accessibility tools and training (Axe, Deque University)
- Digital.gov: Best practices and case studies for accessible digital government

8.5 Case Studies & Best Practices

- Gov.uk: Known for a strong commitment to accessibility-first design.
- Massachusetts.gov: Recognized for integrated accessibility in state digital services.
- Digital.gov Case Studies: Real-world examples from government teams working toward inclusive services.

By using this quick-reference guide, county teams can embed accessibility into everyday workflows—resulting in digital services that are inclusive, legally compliant, and user-friendly for all residents.

Appendix — Optional Implementation Playbook (Guide-Anchored)

Purpose (who/why): For county IT management. A non-technical path that maps directly to the Guide so teams can act without hunting.

Main path

1. **Pick your starting point (Ch. 2)**
   Use the survey insights (knowledge gaps, legacy systems, vendors, PDFs) to choose **one pilot** (a high-traffic page/app flow or a PDF set). Define success for the pilot window.
2. **Run a readiness audit (Ch. 3)**
   Name an accessibility lead, inventory your top 10 pages/docs, set **WCAG AA** as the bar, create a prioritized backlog, and add **accessibility (A11y) acceptance criteria** to tickets.
3. **Knock out quick wins (Ch. 8: role checklists)**
   - **Editors:** headings, alt text, link text
   - **Designers:** color contrast, focus states, zoom
   - **Developers:** keyboard support, labels/errors, landmarks
   - **PDFs:** export tagged; fix reading order
4. **Stand up lightweight governance (Ch. 7)**
   Monthly scan, quarterly review, simple exception path, and a named owner for policy/training/reporting. Publish/refresh a brief accessibility statement and track issues in your normal backlog.
5. **Buy better software (Ch. 6 + Procurement Appendix)**
   Require an **ACR (completed VPAT)**, watch a **live demo** (keyboard + screen reader), and lock gaps into a **time-bound remediation plan** tied to acceptance/SLAs.
6. **Train by role & keep it small (Ch. 8 + Resources)**
   Short, recurring sessions by role; point staff to the Guide's resource links rather than rewriting technical docs.
7. **Make it stick (Ch. 7)**
   Measure a few KPIs: **% key pages passing basics**, **# critical defects**

opened/closed, time-to-fix, # products with ACR + demo + remediation, # staff trained.

References

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15. **Accessible Authentication Guide**, UK Government. Available at: https://www.gov.uk/

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17. **NIST 800-63B: Digital Identity Guidelines**, National Institute of Standards and Technology (NIST). Available at: https://pages.nist.gov/800-63-3/sp800-63b.html