



DRCOG Accessibility Plan

July 1, 2024

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Purpose and scope

The purpose of the accessibility plan is to demonstrate good faith progress with removing accessibility barriers across DRCOG's inventory of information and communication technology in active use.

This document provides a high-level summary of compliance for websites and apps, documents, third-party software, and hardware. It also reports recent accomplishments and outlines next steps.

The report is updated annually, at minimum, in July at the beginning of DRCOG's fiscal year.

Compliance summary

Definitions

Accessible means that the information and communication technology has been tested according to the protocols outlined in DRCOG Accessibility Policy Appendix E and results indicate that all WCAG 2.1 A and AA criteria are satisfied.

Partially accessible means that the information and communication technology has been tested according to the protocols outlined in DRCOG Accessibility Policy Appendix E and results indicate that some but not all WCAG 2.1 A and AA criteria are satisfied.

Not accessible means that the information and communication technology has been tested according to the protocols outlined in DRCOG Accessibility Policy Appendix E and results indicate that none of the WCAG 2.1 A and AA criteria are satisfied.

Unknown means that the information and communication technology has not been tested.

Exempt means that the information and communication technology is not subject to accessibility law because it is a working draft, archive, out of DRCOG's control, or documented as undue burden.

Audience can be internal (DRCOG employees or a subset thereof) or external (the public or a subset thereof).

Potential impact is determined by considering the size of the audience and the anticipated severity of the accessibility issue (e.g., whether it will completely, moderately, or not at all impede the use of the information and communication technology). The process to assess impact is outlined in DRCOG Accessibility Policy Appendix F.

ICT means information and communication technology.



Websites and apps

DRCOG maintains nine websites and applications, four of which are external-facing and five are internal-facing. Due to relatively high traffic from the public, the DRCOG website was prioritized for accessibility remediation. This effort was accomplished through a refresh project wherein a consultant rebuilt the entire site with improved navigation, updated branding, and curated content, among other changes. The new DRCOG website launched in June 2024.

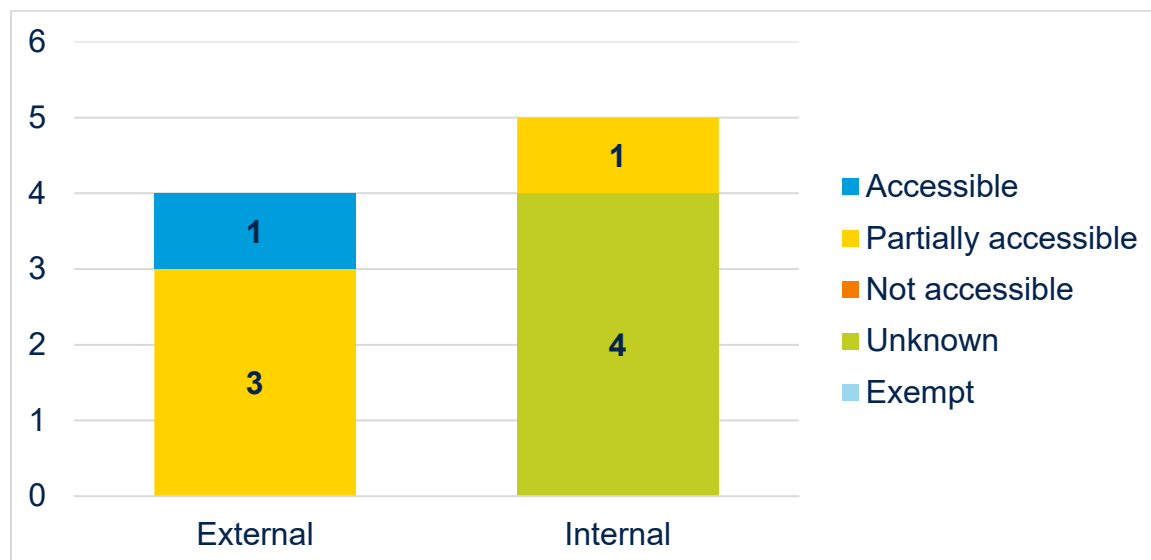
Other external sites include the TRIPS database, ITS infrastructure, and the Regional Data Catalog. All three of these have been assessed for accessibility and effort has been made to remedy any issues. However, all three remain only partially accessible due to the nature of their content, including complex diagrams and visual, spatial information. Accommodations such as downloadable data are available wherever possible. Due to the relatively small, technical audiences for these sites, the estimated impact of the remaining accessibility issues is low.

Regarding internal sites, DRCOG staff prioritized the intranet (“Cognizance”) for accessibility remediation. This site is used by all DRCOG employees to access such things as internal newsletters, the staff directory, IT user guides, and policies and procedures. Staff have assessed this site and are planning to implement changes in August 2024.

Other internal sites, including the Focus Travel Model, the Contracts database, the Ombudsman app, and the RPD wiki, have not yet been assessed due to their small audiences and estimated low impact.

Reporting in this section is for the platforms and their native web content. Attachments are covered in the section on Documents.

Figure 1. Accessibility status of websites and apps



Status	Audience	ICT	Potential impact
Accessible	External	DRCOG website (drcog.org)	High
Partially accessible	Internal	DRCOG intranet (cognizance.drcog.org)	Moderate
Partially accessible	External	TRIPS	Low
Partially accessible	External	ITS infrastructure	Low
Partially accessible	External	Regional Data Catalog (data.drcog.org)	Low
Unknown	Internal	Focus Travel Model	Low
Unknown	Internal	Contracts	Low
Unknown	Internal	Ombudsman	Low
Unknown	Internal	RPD wiki	Low

Documents

As part of the project to rebuild the DRCOG website, external documents were evaluated for relevance. Staff determined that approximately 70% of the documents would not be loaded onto the new website. The remaining 30% were prioritized for remediation.

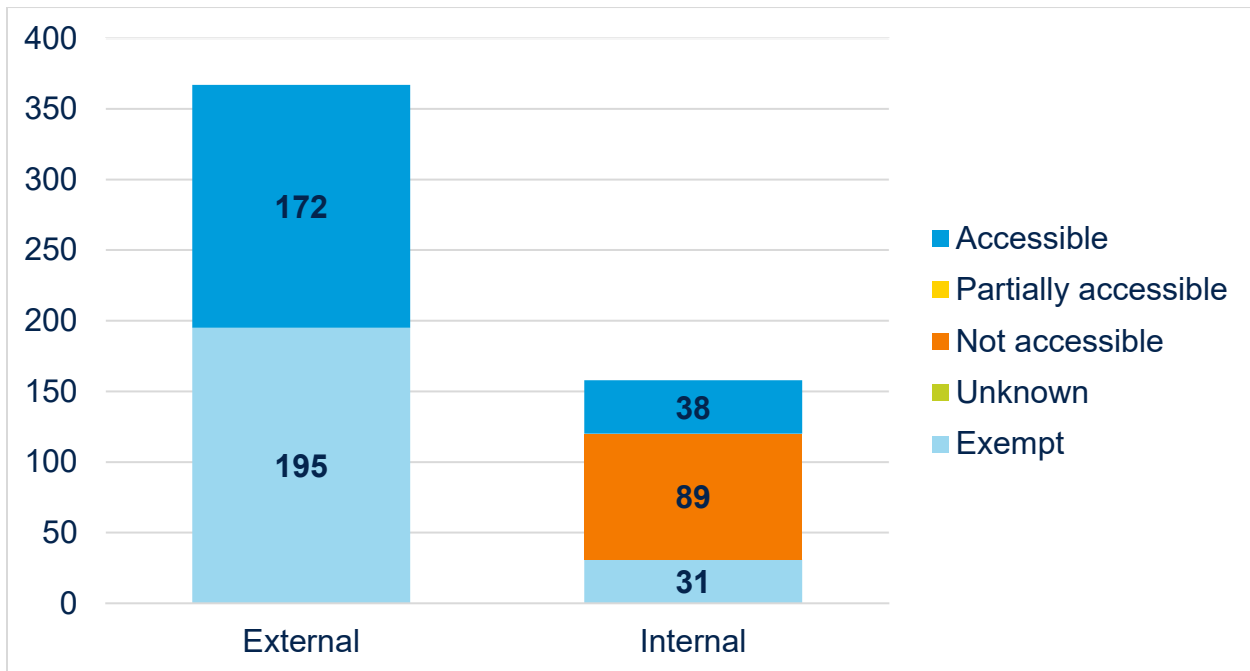
Approximately 170 external documents totaling 4,700 pages were remediated by a consultant or in-house staff. All documents on the DRCOG website are now accessible except for items that are exempted from the law, including archives and content owned by a third-party. For those items that remain inaccessible, such as past meeting agenda packets, DRCOG will remediate or provide a reasonable accommodation upon request.

Regarding internal documents, DRCOG staff prioritized policies and procedures on its intranet, which are required to be read and understood by all employees. Approximately 40 documents totaling 400 pages were remediated by in-house staff. Many of the other documents on the intranet are still queued for in-house remediation or are exempt because they are owned by a third-party, such as insurance benefit providers.

Internal documents that are not published on the intranet are considered working drafts or archives and are therefore exempt. These documents are only remediated upon request. For example, if a staff member on the project team needs a document to be accessible throughout its development (e.g., when it is still a working draft) so that they can contribute, the project team will make this accommodation.



Figure 2. Accessibility status of documents



Status	Audience	ICT examples	Potential impact
Accessible	External	PDFs on drcog.org	High
Accessible	External	PDFs on data.drcog.org	Moderate
Accessible	Internal	60% of the policies and procedures on cognizance.drcog.org	Moderate
Not accessible	Internal	IT guides on Cognizance; 40% of the policies and procedures	Moderate
Exempt	External	Audits and certifications not owned by DRCOG; archived past meeting materials	High
Exempt	Internal	Benefits information not owned by DRCOG	Moderate
Exempt	Internal	Working drafts and archives (<i>not shown on the graph due to high volume</i>)	Low

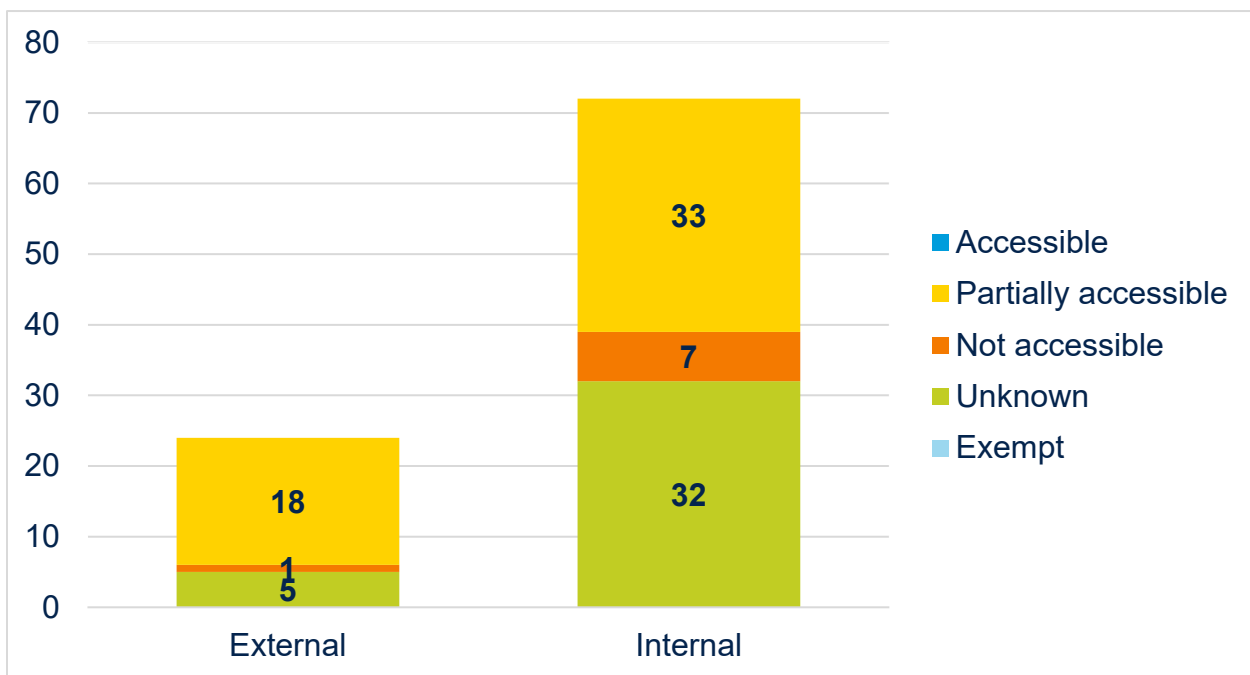


Third-party software and apps

DRCOG contracts with third-party companies for 96 software solutions, including 24 that engage a public audience and 72 that are used internally by employees. DRCOG requested that these vendors self-report their accessibility through an Accessibility Conformance Report (also known as a ACR or VPAT).

Of the reports received, none indicated that *all* WCAG 2.1 A and AA criteria were supported. Eight of the respondents reported that their platform was inaccessible while 51 reported partial accessibility. The remainder, 37 vendors, did not respond so the accessibility of their platform is unknown.

Figure 3. Accessibility status of third-party software and apps



Status	ICT examples	Audience	Potential impact
Partially accessible	Bidnet, Cvent, WebGrants, ESRI Dashboard, ESRI Experience Builder, ESRI Storymap, Social Pinpoint	External	Moderate
Partially accessible	Adobe Suite, Docusign, Microsoft Office Suite, Survey Monkey	Internal	Moderate
Not accessible	Flickr	External	Low
Not accessible	Eden, Shutterstock, Strava Metro	Internal	Low
Unknown	Nearmap, Doodle, Ride Report	External	Low
Unknown	Campaign Monitor, Acumatica, Ivanti Service Manager	Internal	Moderate



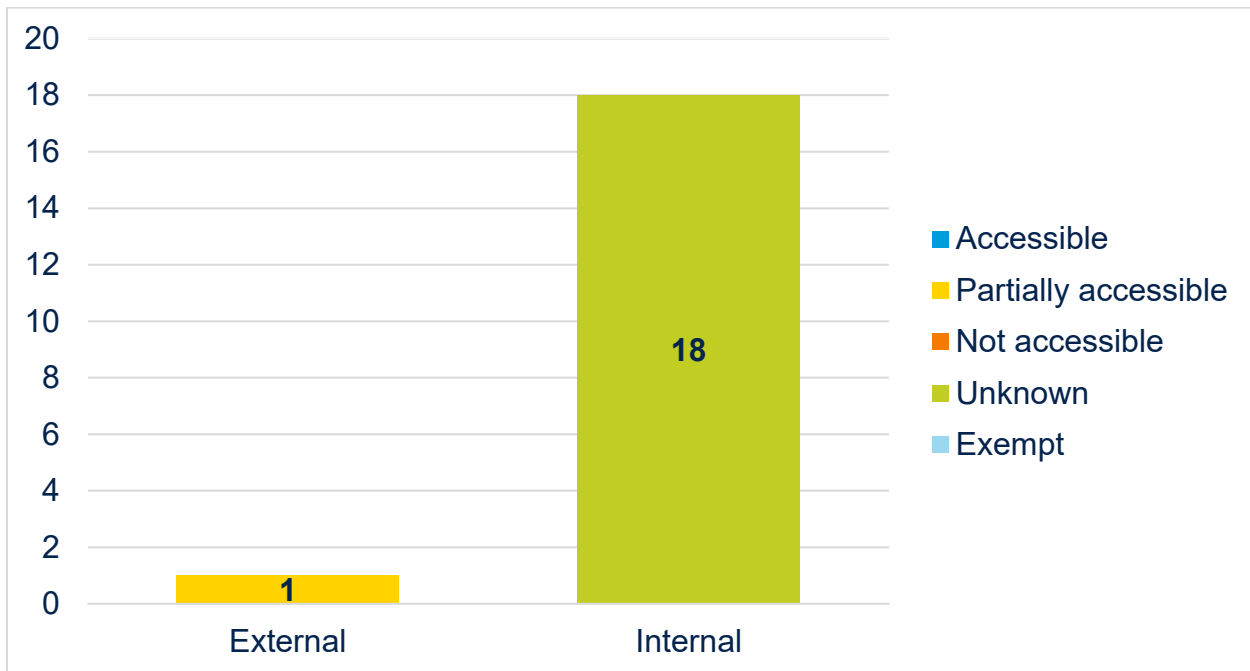
Hardware

DRCOG staff prioritized the assessment of a virtual reception kiosk. It is only partially accessible because it does not currently offer auditory or tactile interfaces. However, DRCOG rarely receives unexpected visitors to the office, so this impact is estimated to be low.

Hardware that is assigned to an individual (such as personal computers, keyboards, and phones) is made accessible by request only so that the solution can directly meet the specific need. These accommodations are known only to the requestor, Information Technology, and Human Resources.

Hardware that is common to all employees, such as printers, microwaves, and vending machines, has not been assessed. DRCOG staff are waiting for more guidance from authorities like the Office of Information Technology on how to proceed in this area.

Figure 4. Accessibility status of hardware



Status	ICT examples	Audience	Potential impact
Partially accessible	Virtual reception kiosk	External	Low
Unknown	Printers, copiers, microwaves, personal computers, tablets, desk phones, vending machine	Internal	Moderate



Accomplishments

Accomplishments cover what has been achieved during the July 1, 2023 – June 30, 2024 fiscal year.

Investment

DRCOG invested approximately \$470,000 to improve accessibility including:

- \$1,000 for a disability etiquette and awareness training course.
- \$7,000 for document remediation software and a training course.
- \$20,000 for a document remediation consultant.
- \$24,000 for a website consultant.
- \$48,000 for staff costs for time spent in training.
- \$370,000 in staff costs for project management, policy development, remediation of documents, websites, applications, webmaps, and related tasks.

Governance

DRCOG staff developed an Accessibility Policy that outlines roles and responsibilities and provides guidance for training, remediation, reporting and procurement. Policy highlights include:

- The creation of a new role - accessibility compliance officer – that is responsible for maintaining accessibility policies, plans, and supporting documents that ensure organizational compliance to state law. They are also responsible for managing contracts with accessibility vendors.
- A grievance procedure that anyone – including the public, stakeholders, and employees – can use to ask for accommodations or report an accessibility issue for DRCOG staff to address.
- Instructions for staff on how to pursue remediation needs and determine responsibility.

Additionally, the policy includes the following appendices that provide extensive detail to support staff in implementation.

- **Appendix A: Training plan** – a list of accessibility courses organized by role.
- **Appendix B: Guide to style** – an illustrative guide of how to write in the organization’s style while adhering to accessibility rules and best practices.
- **Appendix C: Guide to alt text** – an explanation of how and when to use alt text, including a glossary of alt text for commonly used images like logos.
- **Appendix D: Statements** – accessibility statements that include two methods to contact DRCOG for accommodation requests or complaints and an expected response time.



- **Appendix E: Guide to testing** - an explanation of the accessibility standard (WCAG 2.1 A and AA) and responsibilities for the who, what, and when of testing.
- **Appendix F: Guide to error handling** – a procedure for staff to follow to ensure due diligence is done to achieve compliance in the event a product remains inaccessible.
- **Appendix G: Annual report and plan template** – a starting point for annual updates.
- **Appendix H: Guidance for contractors** – a handout that can be provided to vendors to set expectations about accessibility.

Skills and Training

The DRCOG Accessibility Policy Appendix A outlines a training plan for staff. All staff are required to do 5 hours of accessibility training related to disability awareness, writing, and making documents and presentations. Additional training is required for staff performing certain roles, such as creating PDF documents, maintaining websites, and managing vendors. Staff completed introductory courses by June 30, 2024.

Skills that correspond to these training courses have been added to employee job descriptions. Additionally, expectations related to accessibility are included in each employee's performance plan.

Evaluation and remediation

Websites and apps

DRCOG contracted with a vendor to rebuild its web properties – consolidating several domains onto one site and incorporating accessibility considerations. The new drcog.org site launched in June 2024.

The DRCOG geographic information systems team maintains webmap and storymap sites that display spatial information in interactive websites using various ESRI platforms. To accommodate accessibility rules, this team created new webmap and storymap templates to ensure current and future products adhered as much as possible to accessibility guidelines. Some issues remain due to the inherent inaccessibility of visual maps and the ESRI platform. Technical limitations have been reported to ESRI Support. Spatial data available through these sites and the Regional Data Catalog were made available as downloadable spreadsheets for ease of use with a screen reader.

Internally, DRCOG staff evaluated the intranet site, Cognizance, and are making necessary adjustments to make it more accessible.



DRCOG also requested a quote from a consultant to test DRCOG sites for accessibility. The cost was too high to be accommodated in the 2024-2025 budget but may be revisited in the following fiscal year based on need.

Documents

DRCOG subject matter experts evaluated each document on its external web properties and determined 70% should not be published to the new website. The remaining 30% were prioritized for updates and/or accessibility remediation. To facilitate this effort, DRCOG hired a document remediation consultant and also equipped 33 staff (approximately 20% of the workforce) with CommonLook PDF licenses and PDF remediation training.

To build in accessibility from the beginning, DRCOG staff developed accessible templates for common documents such as Board and committee meeting materials, PowerPoint presentations, policies, and reports. These templates are made available to all staff through DRCOG's intranet site.

Third-party software and apps

DRCOG contacted its third-party vendors with a notification of the Colorado State accessibility law and requested that these vendors self-report the accessibility of their product or service through an Accessibility Conformance Report (ACR or VPAT).

DRCOG staff also integrated accessibility requirements into the procurement process by adding language to RFP and contract templates.

Hardware

DRCOG staff researched a kiosk for virtual reception.

Next steps

The following is expected to be addressed by July 1, 2025.

- Create organizational or divisional “open POs” for manual captioning, translation, and interpretation services, so that staff can quickly engage vendors to respond to accommodation requests.
- Purchase assisted listening devices that can be “checked out” by staff for meetings when an accommodation is requested.
- Install a virtual reception kiosk.
- Continue remediating internal and external documents according to priority and leveraging consultant and in-house staff as needed.



- Continue to pursue Accessibility Conformance Reports from third-party vendors that provide software that is not accessible or in cases where the accessibility remains unknown.
- Update DRCOG's Fiscal Management Policy with accessibility guidance.
- Provide staff with a training related to accessibility and managing vendors.
- Update policy, plan, and reporting documents as needed.

Attachment A: September 2024 Quarterly Update

Quarterly progress reports are required to show good faith effort per Colorado House Bill 24-1454: Grace Period Noncompliance Digital Accessibility.

Attachment B: December 2024 Quarterly Update

Quarterly progress reports are required to show good faith effort per Colorado House Bill 24-1454: Grace Period Noncompliance Digital Accessibility.

Attachment C: March 2025 Quarterly Update

Quarterly progress reports are required to show good faith effort per Colorado House Bill 24-1454: Grace Period Noncompliance Digital Accessibility.

