

Accessibility Plan 2025 – 2026 Colorado Department of Law

July 1, 2025

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#### Background

House Bill 21-1110 provides that individuals with disabilities have equal access to the Department of Law's programs, services, and activities. The Colorado Governor's Office of Information Technology (OIT) has adopted regulations providing that one method for demonstrating such accessibility is by publishing an accessibility plan which shows evidence of the Department's good faith progress towards removing accessibility barriers across its inventory of Information Communication Technology (ICT) in active use.

#### **Purpose**

The Colorado Department of Law is committed to providing equitable access to its programs, services, and activities. The goal of this Accessibility Plan is to summarize the good-faith progress that the Department of Law is taking to identify and remove accessibility barriers across its inventory of ICT so that individuals with disabilities may have equal access to the Department's programs, services, and activities.

#### **Executive Summary**

The Department of Law is committed to providing individuals with disabilities access to its services and removing barriers to accessibility. This Accessibility Plan serves as the Department of Law's approach toward demonstrating progress in making our digital content accessible to users with sensory, cognitive, and mobility disabilities and ultimately to all users, regardless of ability. This Accessibility Plan is evaluated and updated annually to ensure that it properly represents the Department's current efforts towards accessibility. The 2025 – 2026 Accessibility Plan will cover the Department's efforts towards digital accessibility leading up the publication of this Accessibility Plan and the efforts the Department of Law plans to take during the 2025-2026 year and beyond.

### **Accessibility Contact Information**

The Colorado Department of Law Accessibility Program Coordinator is responsible for preparing and updating this Accessibility Plan and can be contacted at:

Accessibility Program Coordinator Email: <u>Accessibility@coag.gov</u> Phone: (720) 508-6411

The Department of Law website contains useful information for individuals with disabilities including notice of rights, how to request an accommodation, and grievance procedures. Please refer to the <u>Accessibility Statement website</u>.

# **Accessibility Statement**

The Department of Law has published an Accessibility Statement that identifies: (i) how to request reasonable accommodations or modifications; (ii) how to report inaccessible ICT; and (iii) any applicable existing grievance procedures that the public entity is required to maintain under other laws. If reporting inaccessible ICT or requesting an accommodation/modification, please refer to the Accessibility Statement. The Accessibility Statement provides various contact methods.

## **Accessibility Standards**

Our ongoing technology accessibility efforts rely on the technical standards provided by:

- 8 CCR 1501-11 Rules Establishing Technology Accessibility Standards
- World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.1 Level AA or higher
- Section 508 of the U.S. Rehabilitation Act of 1973, Chapter 4

## **Reasonable Accommodations**

The Department of Law maintains policies and procedures for its employees to request reasonable accommodations. Those policies and procedures are located on the Department of Law employee SharePoint site and contain information about how to request a reasonable accommodation along with the contact information for the Department of Law ADA Title I Coordinator. The Department of Law is committed to providing timely responses to requests for reasonable accommodations to ensure equal access.

## **Reasonable Modifications**

Individuals with disabilities may contact the Department of Law ADA Title II Coordinator to request reasonable modifications to public-facing content. The Department of Law's public-facing website and Accessibility Statement provides information on how a reasonable modification request can be made and how to contact the ADA Title II Coordinator. That information is located on the Department's website - coag.gov. Specifically, the Department of Law's Accessibility Statement is available on the Accessibility Statement website. The Department of Law is committed to ensuring that individuals with disabilities have equal access to its programs, services, and activities and will work to timely respond to requests for reasonable modifications by working with individuals with disabilities towards identifying reasonable modifications to provide equal access.

### **Progress Towards Removing Accessibility Barriers**

#### A. Improvement Measures Already Taken

Past progress reports are available at the <u>Accessibility Statement website</u>. The following is a summary of actions already taken.

- 1. Formation of a Digital Accessibility Team
  - a. Created and hired a new position, the Accessibility Project Coordinator, to facilitate compliance, remediation, education, training, and reporting efforts
  - b. Organized a digital accessibility team to oversee the Department of Law's efforts towards digital accessibility. The team includes members from web development, design, content, technology, human resources, and legal.
- 2. Accessibility Evaluation
  - Conducted a review of all public-facing websites and web applications using accessibility analysis tools including axe DevTools and JAWS Inspect and the automated web accessibility scoring tool, Siteimprove. Identified key areas for further assessment.
  - b. Conducted a manual review of internal-facing websites and applications to determine accessibility levels.
- 3. Implementation of Immediate Fixes and Processes

- a. Addressed critical accessibility issues identified, such as alternative text for images, color contrast, accessible headings and fonts.
- b. Added accessible elements, such as skip navigation coding for all StopFraudColorado, NoMasFraudeColorado, Safe2Tell and Coag websites. This included installing a new plug-in to allow media and documents to be replaced instead of re-uploaded which had caused duplicated files and inaccessible links.
- Remediated and corrected over 120,000 occurrences of Level A and Level AA accessibility issues on the main websites (Coag, StopFraudColorado, NoMasFraudeColorado, Safe2Tell, and POST) in the last 12-month period.
- Identified more than 2,800 documents for potential improvement or removal, resulting in the elimination of more than 500 documents. Additionally, procured a PDF remediation software tool to enhance the efficiency of the remediation process.
- e. Engaged vendors for development and remediation of StopFraudColorado, NoMasFraudeColorado, Safe2Tell, P.O.S.T., and coag.gov websites.
- f. Incorporated accessibility requirements into procurements processes.
- g. Deployed an Accessibility Statement across all public-facing websites, including a dedicated email and telephone number.
- 4. Training and Awareness
  - a. Developed accessibility awareness presentations and trainings for Department leaders.
  - b. Developed a comprehensive presentation about digital accessibility and delivered the presentation individually to all Department of Law sections.
  - c. Created and launched a Digital Accessibility Hub intranet site with accessibility information, resources, and training tools.
  - d. Launched interactive Department of Law office hour sessions to provide information, answer questions, and showcase common accessibility solutions.
  - e. Delivered a series of real-time and recorded trainings to provide staff with the knowledge and skills needed to create accessible digital content in native applications and to perform document remediation using Adobe Acrobat and other tools.
  - f. Partnered with content creators to review materials for accessibility, offering targeted feedback and hands-on training.
- 5. Compliance and Enforcement

- a. Clearly defined roles and expectations to ensure accountability and clarity within the Department of Law to prevent duplication of efforts, further define responsibilities, and enhance efficiency within the department.
- b. Established a complaint intake and tracking process to address requests for redress of any inaccessible documents or other accommodations.

#### B. Action Underway & Future Efforts

Many of the action items noted above are ongoing, such as efforts to identify and remediate any accessibility issues. The following is a summary of the Department of Law's ongoing or upcoming plans.

- 1. The Digital Accessibility Team will continue its work overseeing and implementing improvements in compliance, remediation, education, training, guidance, and reporting efforts.
- 2. The Digital Accessibility Team will continue its ongoing evaluation and audits of external webpages on a weekly basis.
- The Digital Accessibility Team will continue to timely address identified accessibility issues or otherwise respond with appropriate modifications, accommodations, or conforming alternate versions.
- 4. Additional Department of Law-wide trainings will be delivered to ensure that Department of Law staff understand accessibility requirements and expectations.
- 5. The Digital Accessibility Team will continue compliance and enforcement efforts through Department of Law complaint intake, redress, and tracking processes.
- 6. Prioritization of ICT in Active Use: The Department of Law is prioritizing public-facing and internal-facing ICT in active use by identifying content and documents as archived, as appropriate. Members of the public and Department of Law employees are able to request accommodations, modifications, or conforming alternate versions of archived materials as needed.
- 7. Means of Compliance: The Department of Law will make ICT in active use accessible through the following means as appropriate:
  - a. Meeting the WCAG 2.1 technical standards levels A or AA;
  - b. Utilizing a conforming alternate version;

- c. Providing reasonable modifications or accommodations, when requested, to remove accessibility barriers;
- d. Publishing this Accessibility Plan which shows evidence of the Department of Law's good faith progress towards removing accessibility barriers across its inventory of ICT in active use and updating the plan annually; or
- Procuring and providing reasonable accommodations or modifications, if needed, for the ICT that best meets the technical standards and the Department of Law's business needs.
- 8. Importance of Program, Service, or Activity: The Department of Law recognizes that its programs, services, and activities serve critical roles for Colorado residents. Any known accessibility issues affecting members of the public or Department of Law employees will be addressed. The Department of Law has diligently reviewed its public-facing web pages and resources, encourages individuals to submit feedback and accommodation requests to ensure access to its services, and has posted an accessibility statement with additional resources and information on the <u>Accessibility Statement website</u>.

### **Timeliness to Address Inaccessible ICT**

The Department of Law is committed to providing timely responses to reports of inaccessible ICT. To that end, when inaccessible content is identified or a modification/accommodation is requested, the Department of Law will respond within a reasonable time given the individual circumstances including any applicable deadlines or other considerations.

### **Procedures for Testing and Remediating ICT**

The Department of Law approaches digital accessibility comprehensively by integrating both human expertise and automated testing tools. This includes the use of common digital accessibility tools such as WAVE, Siteimprove, and Axe DevTools to scan for common accessibility barriers across websites. The Department also incorporates screen reader testing using JAWS and JAWS Inspect for more thorough evaluation, as well as keyboard-only functionality to better understand the user experience for someone using these assistive technologies. In addition, the Department is actively engaged in document testing and remediation. Remediation is conducted with these tools when needed, and staff also utilize Adobe Acrobat and CommonLook to address more complex PDF remediation.

#### **Procedures for New Digital Content**

The Department of Law has trained employees on the expectation that they are responsible for ensuring that digital content created complies with the accessibility standards. Employees are expected to contact the Department of Law's Digital Accessibility Team with any questions or to seek assistance with accessibility issues that arise when creating new content.

# **Training and Resources**

The Department of Law is strengthening its digital accessibility efforts through several coordinated initiatives aimed at building both foundational awareness and advanced skills among employees. These efforts are designed to equip staff with the knowledge, skills, and tools needed to create accessible content and improve the digital experience for all users. The Digital Accessibility Team is planning the following initiatives:

- A. Expanded resource offerings: Employees can internally submit digital accessibility questions and receive timely, practical guidance from the Digital Accessibility Team. The Team is working to further create and refine internal guidance, checklists, and other tools to support digital accessibility efforts.
- B. **Intranet revamp:** The team will work to redesign the employee Digital Accessibility intranet to make digital accessibility resources easier to find- by streamlining content and organizing information in a clearer, more intuitive way.
- C. **Targeted training and workgroups:** The team will continue to offer focused training sessions and collaborative workgroups tailored to the needs of content creators across different roles.
- D. Advanced recorded trainings: The team will continue to develop brief, topic-specific recordings covering complex accessibility topics such as forms and multimedia content.

# Accessibility Maturity

The Department of Law is currently in the Launch and Integrate Stages of Accessibility Maturity.

Stage	Criteria
Inactive	No awareness and recognition of need. At this stage, organizations are inventorying their technology, have begun to make investments, etc.
Launch	Recognized need organization-wide. Planning initiated but activities not well organized.
Integrate	Roadmap including timeline is in place; overall organizational approach defined and well organized.
Optimize	Incorporated into the whole organization, consistently evaluated and actions taken on assessment outcomes.

# Conclusion

The Department of Law recognizes the importance of continuous improvement of accessibility challenges and increasing awareness of the digital accessibility law. While our efforts and refining our practices are ongoing, our commitment to continuous improvement is paving the way for a more inclusive and accessible digital experience. The Accessibility Plan will be updated annually. We will continue to prioritize accessibility of all ICT in active use in an effort to ensure that our digital presence is accessible to all users.

For further information or to provide feedback, please contact our Digital Accessibility Team at <u>Accessibility@coag.gov</u> or by telephone at (720) 508-6411.