

SECTION: <i>Information Technology</i>	PAGE 1 OF 4
ORIGINAL ISSUE DATE: 11/08/2016	HUMBOLDT COUNTY Website Accessibility Policy
REVISION DATE: 02/27/2018 10/16/2018	

I. PURPOSE

The purpose of this policy is to establish guidelines for website accessibility and to ensure compliance with state and federal laws regarding equal access to websites and content for individuals with disabilities and to ensure that the county's internal and external websites meet the Web Content Accessibility Guidelines (WCAG) version 2.0 level A and AA and WCAG version 2.1, published by the World Wide Web Consortium (W3C). This policy applies to all departments and divisions who provide services to the public via the website or other digital means.

Title I of the Americans with Disabilities Act (ADA) prohibits employers from discriminating against qualified individuals with disabilities in all stages of employment, including job application procedures. The county must ensure that its employment opportunities, website, and job applications contained therein, conform to accessibility standards.

Title II of the ADA requires that the County of Humboldt provide individuals with disabilities equal access to programs, services, or activities. Equal access means providing the same information and functionality, delivered in the same time frame, with substantially equivalent ease of use.

The county seeks to deploy information technology that has been designed, developed, or procured to ensure the county's internal and external websites are accessible to people with disabilities, including those who use assistive technology.

II. BACKGROUND

The Americans with Disabilities Act (ADA) and the 1998 amendment to the Rehabilitation Act of 1973 (Section 508) require that government websites eliminate accessibility barriers in information technology, and encourage development of technologies that will help achieve these goals. Under Section 508, agencies must give individuals with disabilities access to information that is comparable to the access available to others.

III. SCOPE

This policy applies to all websites, internal and external, maintained by the County of Humboldt.

This policy **also** promotes accessible websites for the County of Humboldt to help ensure that as broad a population as possible may access, benefit from, and contribute to the county's programs, services and **activities** information.

The policy and its requirements are structured to give departments the flexibility to develop and support a website accessibility program that reflects local needs and resources.

Website accessibility is not a one-time countywide effort but must be incorporated into every website activity on an ongoing basis. Departments need to prioritize website accessibility efforts and continually work toward achieving a more accessible website

IV. POLICY

- A. The county is committed to providing the public, including individuals who use assistive technology, access to web-based information and services by using the Web Content Accessibility Guidelines (WCAG) version 2.0 level **AA** and **WCAG version 2.1**, published by the World Wide Web Consortium (W3C).
- B. The county is subject to and must comply with both **Title I and** Title II of the ADA and Section 508 of the Rehabilitation Act. To the extent that there are inconsistencies between Title II and Section 508 regarding website compliance, county departments are advised to comply with the more stringent standards between the two.
 1. The county and its departments are responsible for ensuring that all information posted to its websites, both internal and external, comply with accessibility standards, or that it makes provisions to supply the material in an alternate format.
 2. If the county contracts to develop, maintain, or host websites, the county will ensure that contractor meets accessibility standards and that accessibility standards are addressed within the contract.
- C. Given the rapid pace of technological change, this policy does not stipulate a specific set of design principles but strives to ensure that the most current criteria are used by utilizing the "Humboldt County Web Standards and Style Guide" (hereafter referred to as the "Standards"). Departments are responsible for ensuring that staff and contractors that develop or publish materials to the county website are familiar with these Standards. The Information Technology Division **(IT)** has developed and will periodically review and update the Standards.

- D. All new county websites created after the effective date of this Policy will comply with this Policy.
- E. **Existing** websites will be brought into compliance with this Policy as part of any substantive site additions, updates or redesign.
1. **S**ubstantive changes include significant changes to navigation structure, redesign of site 'look and feel' and addition of new content areas, programs or services.
 2. Priority for implementing accessibility standards should be given to services that require or make available to the public on-line forms, services most frequently accessed and related information such as: major policy documents and reports, forms, materials associated with public meetings and human resources information.

V. **PROCEDURES**

1. **Contracted Services.** When procuring or contracting for public facing content the contractor must provide deliverables that are accessible and usable with assistive technologies. The deliverables must conform to accessibility standards.
 - a. During the procurement process, potential contractors or vendors of information technology products are required to submit a Voluntary Product Accessibility Template (VPAT) 2.0, or the most recent VPAT version.
 - b. Utilizing the VPAT 2.0, or the most recent VPAT version, County staff must determine the product/service that most conforms to accessibility standards and best meets the business need.
 - c. Prior to initiating a contract for information technology products/services, accessibility testing must be conducted (see 2. Accessibility Testing).
 - d. Prior to renewing a contract for information technology products/services with existing vendors, the vendor must submit a completed VPAT 2.0, or the most recent VPAT version, and timeline for remediation of existing barriers to access in their product.
2. **Accessibility Testing.** The County staff will assess all proposed online services before they are made available to the public for conformance with, at minimum, WCAG 2.0 AA and WCAG version 2.1 by:
 - a. Performing automated accessibility tests, using an automated tool to identify any accessibility barriers; and
 - b. Enlisting individuals with different disabilities, including at a minimum individuals who are blind, deaf, and have physical disabilities (such as

those limiting the ability to use a mouse), to test for ease of use and accessibility barriers. The County's ADA Coordinator is a resource for enlisting assistance in testing the accessibility of information technology and digital information during the decision-making processes and annually after implementation.

3. Training. Individuals responsible for maintaining and updating the website shall have a working knowledge of accessibility requirements. To that end, identified staff is required to annually participate in a minimum of two hours continuing education and training related to website accessibility.
4. PDF Accessibility. Documents containing text posted on the County's website will, to the greatest extent possible, be accessible PDFs or in another alternate accessible format. Consultants providing plans and other documents for public use must provide accessible formats.
5. Accessible Videos and Multimedia Content. New videos and multimedia content that are produced by the County will have captioning and audio descriptions. When distributing videos and multimedia content from outside sources, every effort should be made to ensure that accessible content is used.
6. Social Media. Information posted to social media sites must be done in a manner that allows members of the public with disabilities to access information that is comparable to information provided to persons without disabilities. Images posted to social media sites will have alternative text or be accompanied by descriptions that convey the content of the image. When posting videos every effort should be made to ensure that the videos have captioning and/or audio descriptions.
7. Alternative Means. Where information technology that fully conforms to the applicable standards is not commercially available, the County shall provide individuals with disabilities access to and use of services by an alternative means that meets their identified needs. The alternative means must provide substantially equivalent level of access and ease of use.
8. Exceptions. When information technology conforming to the applicable standards is not commercially available, it may be necessary for the County to acquire and utilize information technology that in its current state hinders full access and/or equivalent ease of use for persons with disabilities. The County has an obligation to procure the product that best meets the standards and is consistent with the business need for the information technology. The County is not required to procure information technology that is not needed to perform the intended task.

In such instances, the department(s) wishing to utilize the non-conforming information technology shall request in writing to the County ADA Coordinator for approval of an exception. The exception request shall be accompanied by a temporary accommodation plan that outlines how the department(s) will provide

alternative means until the information technology can be made accessible. The accommodation plan should be established in consultation with the County ADA Coordinator.

The request for exception must include:

- Rationale for the exception request, including a discussion of why no accessible alternative could meet business need;
- Documentation of accessibility issues with the product or service; and
- A temporary accommodation plan.

The temporary accommodation plan must:

- Provide an equivalent level of access and ease of use for individuals with disabilities;
- List the parties responsible for implementation and oversight;
- Outline how the existence of the accommodation will be communicated to users;
- Include a timeline for remediation of current barriers with the product or service (such as accessibility improvements/upgrades/patches); and
- Indicate what is being done to ensure that the product or service will become accessible (interactions with vendor/developers, detailed feedback from the public, etc.), including provision to nullify the contract with the vendor or replace the system if remediation timeline is not satisfied.

VI. RESPONSIBILITIES

- A. County departments and divisions are responsible for implementing this policy.
- B. County web page developers, content providers and document authors are responsible for ensuring county websites and content comply with this policy.
- C. Agency web page developers and content providers (includes document authors) shall become familiar with the guidelines for achieving accessibility and shall apply these principles in designing and creating any official county websites or content.
- D. The Information Technology Division (IT) is responsible for developing and maintaining the “Web Standards and Guidelines – County of Humboldt” (Standards).

E. The County ADA Coordinator is responsible for administering this policy and for resolving any grievances related to this policy.