



County of Humboldt

26-52 - Digital Accessibility Policy

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SECTION I – PURPOSE

The Americans with Disabilities Act (ADA) and the 1998 amendment to the Rehabilitation Act of 1973 (Section 508) require that a government’s digital content 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.

Title II of the Americans with Disabilities Act (ADA) requires the County of Humboldt to 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.

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.

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

The county strives to achieve website accessibility compliance by adhering to the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA, which is the widely accepted benchmark for accessibility in both public and private sectors. The U.S. Department of Justice published a new rule on digital accessibility under Title II of the ADA in April 2024. This rule requires public entities to ensure their digital content, including websites, mobile applications and other digital services, meet WCAG 2.1 Level AA technical standards. Compliance deadlines vary based on the population size. Humboldt County must comply with WCAG 2.1 Level AA by April 24, 2026.

SECTION II – APPLICATION

This policy applies to all digital services, maintained by the county of Humboldt and its third-party vendors for both external and internal use by county employees and/or members of the public. This policy applies to all online technologies, including external and internal facing websites, mobile applications, electronic communication and digital documents such as portable document format (PDF).

This policy also includes social media posts on county owned and/or maintained social media accounts.

Digital accessibility is not a one-time countywide effort but must be an ongoing effort incorporated into every online digital service and electronic communication activity. It is imperative that all county departments prioritize digital accessibility efforts and continually work toward achieving more accessible web content, digital services and communications.

SECTION III – DEFINITIONS

1. ADA: The Americans with Disabilities Act (ADA) is a federal civil rights law that prohibits discrimination against people with disabilities in everyday activities. The ADA prohibits discrimination on the basis of disability just as other civil rights laws prohibit discrimination on the basis of race, color, sex, national origin, age and religion. The ADA guarantees that people with disabilities have the same opportunities as everyone else to enjoy employment opportunities, purchase goods and services and participate in state and local government programs.
2. Digital Services/Content: Includes, but is not limited to, websites, mobile applications, electronic communication and digital documents such as portable document format (PDF).
3. WCAG: Web Content Accessibility Guidelines (WCAG) provides guidance to make web content more accessible to people with disabilities. There are multiple versions and conformance levels. County and ADA requirements currently reference WCAG version 2.1, conformance level AA.

SECTION IV – POLICY

- A. The county is committed to providing the public and employees, including individuals who use assistive technology, access to digital services by using the Web Content Accessibility Guidelines (WCAG) version 2.1 level AA, 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 the ADA and Section 508 regarding website compliance, county departments are advised to comply with the more stringent standards between the two.

- C. The county and its departments are responsible for ensuring that all information posted to its websites and social media, both internal and external, comply with accessibility standards, or that it makes provisions to supply the material in an alternate format.
- D. If the county contracts to develop, maintain, or host websites or social media, the county will ensure that contractor meets accessibility standards and that accessibility standards are addressed within the contract.
- E. If county departments purchase third party software the county will ensure that the software meets accessibility standards.
- F. 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 Digital Standards and Style Guide" (hereafter referred to as the "Standards"). Departments are responsible for ensuring that staff and contractors that develop or publish digital content and materials to the county's website, mobile applications and social media sites are familiar with and adhere to these Standards.
- G. All new county digital services, including websites, mobile applications, and social media content and electronic communications created after the effective date of this Policy will comply with this Policy.
- H. Existing digital content, including websites, mobile applications and social media and its contents created prior to the effective date of this Policy will have 30 days to bring content into compliance.
- I. Failure to bring content into compliance will result in content being archived and/or removed.
- J. Future website and social media non-compliance will have 30 days to correct barriers to access, such as inaccessible tables, headings or links, after monthly website accessibility reports are received or a remediation request is made.
- K. Failure to remedy barriers to access within 30 days after website access reports or remediation requests are received will result in the website content being archived or removed.
- L. Failure to remedy Social Media barriers to access within 30 days of being notified will result in the Social Media Committee reviewing such action and may result in access being disabled or removed and the Social Media Committee remedying the discrepancy.
- M. Priority for implementing accessibility standards should be given to frequently used services, especially those involving online forms or critical information, including major policy documents, reports, public meeting materials, emergency communications and human resources information.
- N. In the event the Social Media Policy or the Digital Standards and Style Guide conflict with this policy this policy shall govern.

SECTION V – KNOWN LIMITATIONS

Individuals with, or without, disabilities access digital content and websites with a widely varying sets of capabilities, software and hardware. While this Policy does provide the ability for individuals with disabilities to access digital content, this Policy does not include requirements for the production of every known accessibility need, due to known limitations on existing technology. There may be other circumstances, independent of technology that may limit accessibility of the county’s digital content and services.

While every reasonable effort will be made, it is understood that creating accessible formats for large, complex documents (such as Environmental Impact Reports and reports containing complex tables and graphs), some historical documentation and graphical renderings and photographs maintained by the county may be technologically unfeasible. In this case, the county will be responsible for archiving these documents and providing alternative methods of ensuring accessibility of this material. The county’s website must provide information on how to contact the county to request materials in an alternate format. See the Standards for suggested language to direct the reader in requesting an alternate format.

SECTION VI – RESPONSIBILITIES

All county departments are responsible for implementing this Policy.

County website editors and content creators, including document authors, are responsible for ensuring county websites and digital content comply with this Policy.

County web page editors and content creators must complete training as outlined in Section VII F. Training. Trainings and guidelines are designed to achieve accessibility, and these principles shall be applied in the design and creation of digital services and content by any county official.

The county ADA Coordinator, CAO Public Information Specialist, IT Webmasters and certified digital ADA Coordinators are responsible for developing and maintaining the “Digital Standards and Guidelines” or “Standards” for the County of Humboldt.

The ADA Coordinator is responsible for administering this Policy and for resolving any complaints related to this Policy.

SECTION VII – PROCEDURES

- A. **Procuring Software and Contracted Services**. When procuring software or contracting for digital content, the contractor must provide deliverables that are accessible and usable with assistive technologies. The deliverables must conform to accessibility standards.

During the procurement process, potential contractors or vendors of information technology products are required to submit an Accessibility Conformance Report (ACR).

- B. **Submitting an Accessibility Conformance Report (ACR)**. An ACR is a document that explains how information and communication technology (ICT) products such as software, hardware, electronic content, and support documentation meet and conform to the [Revised 508 Standards for ICT](#).

The recommended template for creating an ACR is the [Voluntary Product Accessibility Template](#) (VPAT).

ACRs should be provided by the vendor upon the department's request. More information for vendors is on the county's external [Accessibility Information for Vendors](#) page, and additional guidance for the department to request and submit an ACR is on the county's internal [ACR/VPAT Procedure](#) page.

Utilizing the submitted ACR, the county Webmaster or the digital accessibility consultant will review and test the product/service to ensure conformance with accessibility standards, and the department will determine which product/service conforming to accessibility standard best meets their business need.

- C. **Prior to initiating a contract** for information technology and digital products/services, accessibility testing must be conducted (see E. Accessibility Testing).
- D. **Prior to renewing a contract** for information technology products/services with existing vendors, the vendor must submit a completed ACR, and timeline for remediation of existing barriers to access in their product (see B. Submitting an Accessibility Conformance Report).
- E. **Performing Accessibility Testing**. County staff will assess all proposed digital services before they are made available to the public for conformance with, at minimum, WCAG version 2.1 AA by:
1. Performing automated accessibility tests, using an automated tool to identify any accessibility barriers; and
 2. Performing manual testing, which may include enlisting third party digital accessibility testers or individuals with disabilities. Testing will include access without sound, without sight and without 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 services during the decision-making processes and annually after implementation.

- F. **Training.** Individuals responsible for maintaining and updating the county's website, digital services, internal and external communications and mobile applications, including social media platforms, shall have a working knowledge of accessibility requirements. To that end, identified staff, including all web editors, are required to annually participate in a minimum of two hours continuing education and training related to digital accessibility as approved by the county Webmaster. Related training requirements are listed on the county's internal [Annual Accessibility Training](#) page.
- G. **Publishing Accessible Content.** All digital content published by the county must be accessible and adhere to the Standards which are made available on the county's external [Web Accessibility](#) page. This includes
1. **Websites.** Websites maintained by the county will comply with WCAG 2.1 AA to the greatest extent possible. A form will be available on all pages to submit website feedback in case accessibility barriers are located.
 2. **PDFs.** Documents containing text posted to the county's websites will, to the greatest extent possible, be accessible PDFs or another alternate accessible format. Consultants providing plans and other documents for public use must provide these in accessible formats.
 3. **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.
 4. **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. Each image posted to social media sites will have alternative text and be accompanied by captions/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.
- H. **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.
- I. **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 submit an [Exception Request Form](#) 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:

1. Rationale for the exception request, including a discussion of why no accessible alternative could meet the business need;
2. Documentation of accessibility issues with the product or service.
3. A temporary accommodation plan must:
 - a. Provide an equivalent level of access and ease of use for individuals with disabilities;
 - b. List the parties responsible for implementation and oversight;
 - c. Outline how the existence of the accommodation will be communicated to users; and
 - d. Include a timeline for remediation of current barriers with the product or service (such as accessibility improvements/upgrades/patches).
4. 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.

Board Approval

Mike Wilson, Chair

Date