



City of Loveland

# Digital Accessibility Action Plan

October 2024 Progress Report





Table of Contents

**Introduction ..... 2**

    Purpose of a Progress Report ..... 2

**July 2024 Updates ..... 3**

**October 2024 Updates..... 6**

**Next Steps..... 8**

**Document Information ..... 9**



## Introduction

Recent changes to Colorado state law have amended the existing Colorado statutes to strengthen protections for persons with disabilities against discrimination (the “Digital Accessibility Law”). Among other things, the Digital Accessibility Law ensures that persons with disabilities are not excluded from participation in or denied the benefits of services, programs, or activities provided by a public entity, specifically with respect to digital content such as websites, applications, electronic records, and other online resources.

The Digital Accessibility Law required all State agencies and local governments to fully comply with State-established accessibility standards on or before July 1, 2024. The City of Loveland (“City”) is committed to digital accessibility for all citizens, and in accordance with its obligations under the Digital Accessibility Law and Federal nondiscrimination statutes like the Americans with Disabilities Act (“ADA”) and Section 504 of the Rehabilitation Act (“Section 504”), has prepared this Digital Accessibility Plan (“Plan”) to guide these efforts.

Given the scale and scope of the Digital Accessibility Law, many Colorado communities found it very challenging to achieve compliance by the original deadline of July 1, 2024. In response, Colorado passed a law that allows for a grace period of one year, effectively making the new date for compliance July 1, 2025.

## Purpose of a Progress Report

Although the City has developed a Plan for compliance, the City has also found it very challenging to complete all of the necessary activities to achieve compliance by July 1, 2024. City staff working on this effort felt that we were close to compliance, but there were certain efforts that could not be formally and fully achieved. Unfortunately, this effort was also in competition with high profile projects and other work requirements. As such, the City has chosen to take advantage of the grace period to better formalize and finalize the organization’s efforts to achieve full compliance with the Digital Accessibility Law.

In order to be in compliance with the requirements of the law allowing for the grace period, a primary requirement is the development of a quarterly progress report that demonstrates concrete and specific efforts toward compliance. This progress report, which will be updated quarterly, will document the City’s efforts to achieve compliance with the Digital Accessibility Law.



## July 2024 Updates

Staff teams were developed and have met regularly in response to the Digital Accessibility Law. As you will see from the documentation of efforts, activities, and progress listed below, staff has paid great attention to this. The items listed below are the primary efforts and activities undertaken by staff.

- The Digital Accessibility Action Plan has been under development for quite some time and is in the final draft stages. The plan is anticipated to be adopted in the next quarter.
- The City has drafted and is in the process of finalizing and implementing the following plans, policies, practices, and procedures. Although not finalized, many current processes and procedures have already been adjusted and aligned with the following to assure compliance with the Digital Accessibility Law:
  - Digital Accessibility Action Plan
  - Digital Accessibility Policy
  - Digital Accessibility Purchasing Requirements
  - Software Selection and Procurement Review
- Standardized language has been developed, and all new contracts are being reviewed to ensure that the appropriate contract language is included to achieve compliance with the Digital Accessibility Law and its requirements. The plan is anticipated to be adopted in the next quarter.
- The City has developed a formal process and review committee that will review and govern the initiation and selection of new software solutions. This new process will not only include a review of the ability to meet the Digital Accessibility Law but will also review solutions for security and compatibility with existing technologies and question whether existing technologies are sufficient to provide the desired outcome. This activity will be formalized in the next quarter.
- Digital Accessibility training for city staff has been researched and reviewed, and licensing has been purchased. In order to achieve compliance and to ensure that City staff had the appropriate skills and training, the City purchased training from a vendor that specializes in ADA training that will be maintained and updated to ensure that it remains current and effective. The training selected will also be able to be integrated into the City's learning management system. This will be important, as it will allow the City to assign, document, and manage staff training, ensuring that the right staff attend and receive the training they need. This will ensure that staff whose position requires them to develop and/or manage digital content and services have the necessary skills.

The training funds were contributed from the IT and Communications & Engagement Department budgets. A formal training plan will be developed and rolled out to City staff in the third quarter of 2024.

- The acquisition of an analysis tool has been completed and it has been implemented. Staff now has the ability to review Web-based software to determine its compatibility with WCAG standards. Monies to cover the maintenance of this software were approved in the 2024 budget process, however, the licensing and

associate costs may need to be increased to be able to analyze more sites and pages. The extended licensing will likely be acquired in the next quarter.

- City staff have tested and implemented Zoom closed captioning for community meetings.
- City staff have acquired and work to implement an updated service that allows for closed captioning to be included with all meetings and content served from the City's online video streaming service and broadcast public-access channel. While this captioning service works well for online on-demand programming, it has faced challenges with live programming. Staff continue to collaborate with the vendor's engineering team to identify and resolve this issue. We are committed to fully integrating the updated captioning system as soon as possible.
- City staff has acquired and implemented digital hearing enhancement devices for use in all meetings within Council Chambers.
- The City recently upgraded all staff computers to Windows 11, which provides an enhanced screen reader with more natural-sounding voices, enhanced voice access to control the PC totally hands-free, and live captions for video captioning.
- The City is in the process of prioritizing and identifying subsets of technologies that are subject to Digital Accessibility Law and its impact to the public, as follows:
  - Websites created and maintained by City employees – The majority of services provided by the City are offered via city-maintained websites. As such, public-facing websites were identified as being among the most important remediation subsets.
  - Electronic documents – Pre-existing electronic documents available to the public online are being prioritized second in the City's remediation efforts. Review and remediation, as appropriate, of all remaining electronic documents is a high priority because online documents tend to include information on how to request a service or a form to submit for services from the City. The City will continue to work towards ensuring that all newly created electronic documents are in compliance with the Digital Accessibility Law.
  - Websites created and maintained by third parties – The City uses vendors to provide certain important services for the public, including but not limited to submitting applications for various permits, registering for recreation services, paying utility bills, etc. These services are vital to the public, but the City's ability to update this form of technology is limited by current contractual obligations, as well as the effort, cost, and timelines to replace. The City is actively working with vendors to confirm their current accessibility guidelines and compliance and is responding accordingly. To the extent the City has control over the accessibility of technology it contributes to these websites (i.e., social media posts), it will ensure that such ICT is in compliance with the Digital Accessibility Law.
  - Other technologies – Including, for example, physical hardware such as kiosks and software assistance programs such as screen readers.



- One of the first services to be reviewed last year was the City’s agenda management solution. Although it was initially determined to be sufficiently compliant, it was recently discovered to have significant challenges in the documents that it generates. Given the nature of the services that this site provides to the community, it was determined that achieving compliance with this solution is a higher priority.

City staff discovered that a neighboring community recently processed an RFP for a compliant solution. Research determined that the City could “piggyback” on the recent RFP selection at the other community to fast-track an acquisition and implementation for Loveland. Initial discussions have occurred with the solution provider, and the plan is to initiate the project in the third quarter of 2024, with hopes of an implementation being completed within nine months.



## October 2024 Updates

The City has continued its processes to mature the organization's digital accessibility state. The team involved in these activities engaged in a broad range of efforts across the organization. Provided below is a list of the highlights of those activities.

- Team members from Purchasing, City Attorney's Office, and Information Technology developed language for all new RFP and bid documents and that has been widely shared with all the organization. The content is being included in purchasing documents that are being released. We are experiencing varied degrees of response from responding vendors, but the process appears to be gaining acceptance as a common practice. As well, accessibility is generally included as a point of discussion during vendor demonstrations.
- As well, the language that was developed for new contracts and agreements and renewals is actively being included in new contracts and agreements. This has resulted in a broader socialization of the digital accessibility requirements and standards as more of City staff encounter the need for the language in the contracts that they are entering into and those that they are renewing. This has required the accessibility team to actively work with more City staff to resolve associated questions and issues.
- In attempts to make the organization more broadly aware, team members have provided multiple detailed presentations on the digital accessibility standards and policies that have been developed for the organization. This included presentations to all city supervisors, all divisions managers, and to the Executive Leadership Team, as well as departmental groups.
- The effort to implement closed captioning for all city broadcasts was completed in this past quarter. Technology had been purchased and implemented to enable closed captioning on City cable and streaming environments in previous years, and further extended during 2024. The technologies acquired would add closed captioning on all streaming mediums, including Comcast, Pulse, online streaming, and Zoom sessions. Unfortunately, technical difficulties were encountered, which impacted the quality of the captioning. City staff were able to work with the associated technology vendors to resolve this issue in the last month.
- Earlier this year it was discovered that the agenda management system provided some challenges for digital accessibility. The team investigated further and received information from the vendor that the solution was generally compliant when accessed in an HTML format. The associated staff met to discuss the path forward for this application. The decision has been made to partner this solution with an upgrade that is planned for the City's overall website in order to become more significantly compliant. This partnership will occur when the team working on the update of the website initiates that project, which is expected to begin in 2025.
- The City acquired digital accessibility training content from the Rocky Mountain ADA Center earlier this year. The content has been reviewed and the City is excited to offer this to the organization. The classes have now been uploaded and configured within the City's learning management system (LMS). Now that they are available within the LMS, all City staff will be able to access and take the full suite of accessibility courses from wherever they might be. At this time, the associated team is developing a training matrix for



the assignment of the courses to staff based upon their roles and responsibilities. Some staff will be required to take more of the courses provided than others depending upon the duties and responsibilities of their position and association with accessibility requirements.





## Next Steps

City staff will continue to work on the items listed above, and the City will aggressively work toward compliance with the Digital Accessibility Law. The next progress report is scheduled to be available on January 1, 2024, at which time it is anticipated that several of the efforts and activities listed above will be completed.

Although the City has until July 1, 2025, under the grace period to reach compliance with the Digital Accessibility Law, staff has set a goal for the City to be in compliance by January 1, 2025. If that goal is achieved, the City will provide the final progress report at that time.



## Document Information

**Title:** Digital Accessibility Action Plan and Policy, October 2024 Progress Report

**Department:** Communication and Engagement; Information Technology

**Published:** October 1, 2024

**Revision Information:**

Version	Date	Amendment	Author(s)
1.0.0	July 1, 2024	Initial issue	Dan Coldiron, Nicole Yost, Logan Garcia
2.0.0	October 1, 2024	October updates	Dan Coldiron, Nicole Yost, Logan Garcia