

# Digital Accessibility Compliance Plan

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EL PASO COUNTY, COLORADO



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# Introduction

El Paso County (“County”) is committed to making the website and Information and Communication Technology (ICT) accessible to as many people as possible. Our ongoing accessibility efforts focus on the usability of our online technology and on identifying barriers that impact access to information. This includes the County customer-facing websites, social media platforms, mobile applications, digital kiosks, electronic communication, and digital documents such as portable document format (PDF).

Once barriers are identified, the county utilizes a strategic approach to address concerns and ensure ongoing accessibility efforts align with the Web Content Accessibility Guidelines (WCAG) 2.1, the U.S. Federal Government Title II of the Americans with Disabilities (ADA) ACT Guidelines, as well as the rules set forth by the Colorado Governor’s Office of Information Technology.

To support this work, the County has identified an Accessibility and Compliance Webmaster to lead policy development, testing, training, and remediation coordination across departments. A Digital Accessibility Governance Committee provides administrative and stakeholder feedback on policies, procedures, risk analysis, communications, and technology procurement to ensure compliance with 8 CCR 1501-11. In addition, executive leadership regularly communicates expectations to departments to ensure continued progress and compliance with accessibility standards.

## Digital Accessibility Statement & Procedures

El Paso County’s digital accessibility statement and accommodation request procedure demonstrate the County’s commitment to ensure individuals with a disability have equal access to all County programs, services and activities.

### Accessibility Statement

El Paso County is dedicated to providing fair access to everyone who visits our site. Our ongoing accessibility efforts follow the [Web Content Accessibility Guidelines \(WCAG\) version 2.1](#) published by the [World Wide Web Consortium \(W3C\)](#), Level AA standards. These guidelines not only make technology accessible for users with sensory, cognitive, and mobility disabilities but also improve usability for all users, regardless of ability.

El Paso County is dedicated to making its website and digital content accessible to as many people as possible. We are actively working to improve the accessibility and usability of our online technology, following ADA Title II and the policies established by the Colorado Office of Information Technology.

## Procedure to Request Reasonable Accommodations or to Report Inaccessible ICT

Individuals with disabilities are encouraged to call 719-520-6464 during normal business hours if they experience any barriers when accessing the County's digital services or if they prefer direct personal assistance. Alternatively, they can request reasonable accommodations or modifications by filling out a form, [Request a Reasonable Accommodation or Report Inaccessible ICT](#). They can also email their request for reasonable accommodation or modification to [EPCDigitalAccessibility@ElPasoCo.com](mailto:EPCDigitalAccessibility@ElPasoCo.com).

## Existing Websites and Web Applications

In 2023, the County initiated an audit of all public-facing webpages to assess compliance with accessibility standards. This review focused on core web accessibility requirements and identified potential accessibility barriers. While many accessibility issues can be addressed internally, some fall outside of the County's direct control. These include infrastructure or code-level limitations within vendor-supplied products. Such systems occasionally introduce new user interface elements that may create accessibility barriers, even when integrated through the County's primary content management system (CMS).

To address these challenges, the County has adopted a structured approach for managing accessibility across its existing websites and web applications.

- **Inventory and Prioritize.** The County is currently inventorying its websites and web applications to prioritize the overall impact of those technologies and to identify the vendors of those technologies.
- **Develop a Timeline and Test Accordingly.** The County will establish a testing timeline for the existing CMS and web-based applications. Because many vendors engage trusted third-party accessibility testing resources, the County will scale its internal testing efforts based on several factors, including the reliability of the vendor's accessibility reports, the overall impact of the application, and the level of risk associated with its use.

- **Build in Feedback and Alternatives.** As the County identifies accessibility barriers with a vendor’s ICT product, vendors will be informed of findings and what barriers require further remediation. In the event vendors do not agree or do not have the ability to remove these barriers, the County will work with the vendor to seek accessibility alternatives.
- **Ensure Access to Programs, Services, and Activities.** Underlying this effort, the County will investigate and ensure that the program, service, or activity impacted by the technology remains accessible—even if the technology is inaccessible. Until the technology is fully remediated, individuals will be able to obtain information or complete transactions through options such as telephone or email, which serve as an equivalent means of obtaining information or completing transactions.

## Existing Websites Content Creation

As part of a County-led initiative to enhance the accessibility of all public-facing webpages, we conducted a comprehensive audit to better understand how our content serves all users. This effort identified key areas for improvement, including:

- Use of images and alternative text
- Heading structure
- Lists and tables
- Color contrast

To address these findings and ensure compliance with state and federal digital accessibility standards, the County has implemented two core practices for website content editors:

- Training
- Automated Testing

## Training

County employees who utilize ICT as part of their county position are required to complete digital accessibility training upon onboarding and annually thereafter. This training ensures continued awareness of, and compliance with, accessibility standards and best practices. In addition, specialized training is provided for designated roles such as Document Remediation Liaisons and website editors.

The County will continue to identify and explore additional training opportunities to strengthen accessibility awareness and maintain compliance across all departments.

## Automated Testing

The County has established a comprehensive accessibility testing framework that uses both automated and manual methods to identify and remediate barriers across its digital platforms. Standardized tools, techniques, and processes are in place to ensure continuous monitoring, consistent evaluation against WCAG 2.1 AA, and accessibility verification for all new and existing technologies to meet evolving compliance needs.

The county utilizes several categories of accessibility tools—including automated web scanners, assistive technologies, browser-based testing extensions, color contrast evaluators, and screen readers—to ensure compliance across all digital services.

## Newly Procured or Deployed Technologies

The County has developed and is testing a risk matrix that categorizes products based on their accessibility risk. The matrix identifies appropriate “levels of proof” that vendors will demonstrate for each risk category.

The risk matrix will enable County departments to assess their risks and inform vendors in advance of what they need to demonstrate to secure a contract with the County. This process enhances efficiency by making departments, agencies, and their vendors aware of what needs to be provided in advance.

As this process is rolled out and used across the County’s departments, the County will continuously monitor and seek ways to improve both efficiency and accessibility.

## Existing Electronic Documents

The County reviewed its electronic documents and used a prioritization framework to identify which ones must be remediated to meet HB 21-1110 and ADA Title II requirements. Priority was given to documents required by law, essential for public use, or frequently accessed. To support this work, departments designated Document Remediation Liaisons, received targeted training, and utilized both internal and professional remediation resources for high-priority documents. As part of the County’s ongoing plan, a consistent process is being established to help departments identify and prioritize documents that require remediation. Non-essential documents may be removed or retained online if clearly labeled, with reasonable accommodation provided upon request.

## Current Document Remediation Tools

To support accessibility compliance, the County employs multiple categories of document remediation technologies, including office-integrated tools, AI-driven remediation platforms, PDF accessibility evaluators, solutions that produce accessible HTML versions of documents, and services that provide live, one-on-one support to users with disabilities.

## New Electronic Documents and Workflow

The County regularly produces new electronic documents, each carrying varying levels of accessibility risk. To manage this proactively, the County is creating a Document Accessibility Flowchart that evaluates risks and opportunities before documents are released. As with the risk matrix for new technologies, this process will be refined over time. This standardized approach will improve efficiency, reduce case-by-case decisions, and ensure that both document authors and Accessibility Specialists follow a consistent, transparent workflow.

## Conclusion

The County has established a plan for digital accessibility compliance that will benefit all El Paso County residents. Policies, procedures and processes have been developed, or are in the process of being developed, to address identified gaps and barriers to existing ICT.

The County will continue to identify and explore new technologies that will support improved digital accessibility for all.