El Paso County Public Health | El Paso County, Colorado

Digital Accessibility Compliance Plan

Adopted: 1 July 2024 | Effective: 1 July 2024

El Paso County Public Health Communications Program

Contents

Overview of Colorado House Bill 21-1110 (HB21-1110) Laws for Persons with Disabilities

On June 30, 2021, the HB21-1110 Act was signed. This act added language to strengthen the current Colorado law for protection against discrimination against persons with disabilities. This specifically relates to accessibility with government information technology.

The added provisions include:

- Prohibiting a person with a disability from being excluded from participating in or being denied the benefits of services, programs, or activities of a public entity or a state agency.
- Clarifying that such prohibition includes the failure of a public entity or state agency to develop an accessibility plan and fully comply with WCAG 2.1, on or before July 1, 2024, with accessibility guidelines established by the Office of Information Technology (OIT).
- Any Colorado agency with the authority to promulgate rules shall not promulgate a rule that provides less protection than that provided by the "Americans with Disabilities Act of 1990".

Our Digital Accessibility Statement

El Paso County Public Health (EPCPH) is committed to providing equitable access to those who visit our site.

Our ongoing accessibility efforts align with the [Web Content Accessibility Guidelines (WCAG) version 2.1](#) published by the [World Wide Web Consortium (W3C)](#), Level AA criteria. These guidelines not only ensure technology accessibility for users with sensory, cognitive, and mobility disabilities but also enhance usability for all individuals, regardless of ability.

The W3C Web Accessibility Initiative (WAI) has developed the POUR principles for web accessibility, which provide guidelines for creating websites that are perceivable, operable, understandable, and robust.

- **Perceivable**: This principle refers to making sure that web content can be perceived by all users. This includes providing text alternatives for non-text content, such as images and videos, and making sure that content is presented in a clear and easy-to-read format.
- **Operable:** This principle is about ensuring that web content is operable by all users, regardless of their abilities. This includes providing keyboard accessibility, making

sure that users can easily navigate through the site, and avoiding any content that could cause seizures or other physical reactions.

- **Understandable:** This principle is about making sure that web content is understandable to all users. This includes using clear and simple language, organizing content in a logical and easy-to-understand way, and providing feedback to users when they complete actions on the site.
- **Robust:** This principle is about making sure that web content is robust and can be interpreted by a wide variety of user agents, including assistive technologies. This includes using valid HTML and CSS, avoiding deprecated code, and making sure that all content is accessible via multiple platforms and devices.

EPCPH is actively involved in continuous endeavors to guarantee that its website and digital content are accessible to individuals with disabilities, adhering to the regulations set forth by the Colorado Office of Information Technology rulemaking.

Accommodations or modifications will be available for people unable to access complex content, or archive content that was created in another format and later digitized or classified as not in active use according to the State of Colorado's definition of "Active Use" in [8 CCR 1501-11 Technology Accessibility Rules](#).

[Learn more about Accessibility Principles here](#)

[View the WACG Guidelines here](#)

El Paso County Public Health ADA Digital Accessibility Procedure

1.0 General

It is the procedure of El Paso County to provide persons with disabilities equal access to County programs, services, and activities. Programs, services and activities that are made available through the EPCPH website will be addressed by EPCPH, in accordance with the Americans with Disabilities Act (ADA).

2.0 Purpose and Scope

This procedure has been developed to promote equal access to programs, services, and activities provided through EPCPH Information Communication and Technology (ICT) to persons with disabilities in furtherance of the EPCPH's obligations under the ADA and related nondiscrimination laws.

This procedure applies to all EPCPH ICT, including EPCPH customer-facing websites, social media platforms, mobile applications, digital kiosks, electronic communication, and digital documents such as portable document format (PDF).

The procedure and its requirements are structured to give EPCPH divisions and program the knowledge and the understanding of the importance of digital accessibility and how it advocates for the local needs and resources of the El Paso County residents. Website accessibility must be incorporated into all areas of EPCPH ICT on an ongoing basis. Executive leadership and all divisions and programs' commitment to prioritizing website accessibility efforts and continuous work toward achieving a more accessible website illustrates EPCPH's dedication to ensuring services are inclusive to all.

3.0 Terms Defined

3.1 "ADA" – The Americans with Disabilities Act, as amended.

3.2 "Section 508" – is a federal law mandating all electronic and information technology that is developed, purchased, used, or maintained by the federal government be accessible to people with disabilities. Section 508 was an amendment to the United States Workforce Rehabilitation Act of 1973.

3.3 "ICT" – Information and Communication Technology, which means information technology and other equipment, systems, technologies, or processes, for which the principal function is the creation, manipulation, storage, display, receipt, or transmission of electronic data and information, as well as any associated content. Examples of ICT include but are not limited to computers and peripheral equipment; information kiosks and transaction machines; telecommunications equipment, software, applications; websites; videos; and electronic documents.

3.4 "WCAG" – The Web Content Accessibility Guidelines developed and published by the Web Accessibility Initiative, a subgroup of the World Wide Web Consortium (W3C).

3.5 "Web Content" – Website pages that provide content in text, visual or audio formats that are made available online for users to obtain information from the county and/or about the county through an **online** experience.

3.6 "Digital Accessibility" – The inclusive practice of removing barriers that prevent interaction with, or access to websites (online), digital tools, and technologies, by people with disabilities.

3.7 "PDF" – Portable documents intended for public use through digital platforms.

3.8 "Active Use" - means ICT regularly used by members of the public to apply for, gain access to, or participate in a public entity's services, programs, or activities. Active use also means currently used by employees to perform their job duties.

4.0 Procedures

4.1 EPCPH shall perform all executive and administrative functions of this procedure.

4.2 Establish a Procedure Statement

4.3 Establish an EPCPH Website Accessibility Statement: See the above online accessibility statement.

4.4 Establishment of Digital Accessibility Roles and Responsibilities

4.5 For all non-digital grievances, the grievance process will follow the existing El Paso County Grievance Procedure, as detailed on the El Paso County website at www.ElPasoCo.com.

5.0 Miscellaneous

5.1 This procedure shall be effective as of July 1, 2024, and shall remain in effect until amended or rescinded.

5.2 This procedure shall be made available to the public on the EPCPH official website www.elpasocountyhealth.org.

6.0 Procedure Statement

6.1 New and redesigned web content published on EPCPH ICT after the effective date of this procedure will conform to WCAG 2.1 Level AA success criteria.

6.2 The aim is to maximize access to and use of the EPCPH's online technologies by persons with disabilities.

6.3 Beginning on July 1, 2024, EPCPH Information and Communication Technology (ICT) that meets the criteria for active use or is newly generated, developed, acquired, or procured after that date will comply with the state's accessibility standards for technology. Active use ICT encompasses the authorized and current versions, excluding any previous versions that might still be accessible, as well as archives, ongoing projects, or drafts. The guidelines for ICT not in active use come into effect when alterations or updates are made, or when an accessible version is sought by someone with a disability.

7.0 Roles and Responsibilities

7.1 EPCPH Communications Program

a) Create EPCPH's Digital Accessibility Compliance Plan.
b) Establish a grievance procedure for Digital Compliance issues.

c) Coordinate with El Paso County's Department of Communications Webmaster for Digital Accessibility compliance procedures.

d) Prepare and provide accessibility awareness, training and guidance to the public health agency.

e) Develop accessibility standards.

f) Work with County procurement office to develop procurement guidelines as necessary.

g) Promote web accessibility awareness externally.

h) Organize ongoing assessment of public health accessibility technologies.

i) Prepare annual audits and reports of findings to public health leadership.

7.2 County Digital Strategy and Technology Department (DST)

a) Collaborate with EPCPH on appropriate tools and technologies that support compliance.

b) Provide tools to support automated accessibility testing (SiteImprove).

c) Assist the EPCPH Communications Program with website programming as needed.

7.3 Public Health Leadership

a) EPCPH leadership to collaborate with the EPCPH Communications Program to ensure staff adopt accessibility best practices as outlined in this accessibility procedure.

b) Attend training when available by the EPCPH Communications Program or the County's ITC/webmaster.

c) Champion accessibility best practices within prospective departments.

d) Comply with this procedure.

7.4 Website Content Editors

a) Attend appropriate and regular accessibility training as provided by the EPCPH Communications Program or the County's ITC/webmaster.

b) Remediate accessibility issues identified in PDFs.

c) Correct inaccessible website content identified by the EPCPH Communications Program.

d) Provide mentorship to department document authors.

7.5 Graphic Designers

a) Attend appropriate and regular accessibility training as provided by the EPCPH Communications Program or the County's ITC/webmaster.

b) Create graphics that are compliant with this procedure.

c) Create social media content that is compliant with this procedure.

d) Remediate accessibility issues identified by the EPCPH Communications Program.

Undue Burden, Fundamental Alteration, or Direct Threat

EPCPH is committed to providing accessible digital services to all individuals, including those with disabilities. However, there may be instances where full compliance with all accessibility standards might not be achievable due to:

- Undue Burden: Implementing certain accessibility measures may pose an unreasonable financial, technical or administrative burden on our limited resources, potentially impacting our ability to deliver essential services effectively.
- Fundamental Alteration: Strict adherence to accessibility standards could fundamentally change the nature of some of our programs, services, or activities, rendering them unfeasible or ineffective.

In such situations, El Paso County Public Health will:

- Demonstrate the burden or risk: We will transparently explain the specific reason(s) why full compliance is not achievable in a particular instance.
- Explore alternative solutions: We will actively seek alternative solutions or reasonable accommodations that effectively address accessibility needs without causing undue burden or alteration. This may include providing different formats of information, alternative communication methods, or accessible technology solutions.

Procedure to Request Reasonable Accommodations, Modifications, or to Report Inaccessible Information/Technology

To request reasonable accommodation or modifications or to report inaccessible information, please fill out the form, [Request a Reasonable Accommodation, Modification, or Report Inaccessible Information](#).

Should the form not be preferred, please send the request to HealthInfo@elpasoco.com with the following information:

- Subject Line: State whether you are reporting inaccessible information or requesting an accommodation or modification.
- First and Last name of the person making the request or report.

- Email address
- Phone number
- Date of the issue you are experiencing
- Which page, document, or application you are having issues with or are requesting reasonable accommodations or modifications?
- Describe the barrier in detail: Note, to help assist with your request/report, please add details about your devices and any assistive technology you may be using. DO NOT enter personal information such as account numbers, passwords, or payment information.

Timeline to Request Reasonable Accommodation, Modification, or to Report Inaccessible Information/Technology

Within 15 calendar days after submission of the request or reported issue, the EPCPH Communications Program will contact the requestor to discuss the submitted information and potentially set a meeting to go over possible resolutions. Within 30 calendar days of the meeting, the Communications Program will respond in writing, and where appropriate, in a format accessible to the person submitting the request or reported issue. The response will explain the position of EPCPH and the resolution.

Division Accessibility Champions

Each division in EPCPH will have a minimum of one division champion. They will be responsible for online accessibility, making sure their online content is accessible and serving as the division liaison for digital accessibility if their team members have questions.

Division champions will follow a training program provided by EPCPH Communications Program and will be available to help create remediation plans for any issues which arise in their department.

Staff Training Requirements

1.0 Authors of Documents intended for public use

 a) Learning Path:
   i. Accessibility fundamentals – [Microsoft training path](#)
   ii. Accessibility for Outlook – [Create accessible email messages in Outlook](#)
   iii. Accessibility for PowerPoint – [Create slides with an accessible reading order](#)

iv.   Accessibility for Word – [Check document accessibility in Word](#)

v.   Accessibility for Excel – [Start with an accessible Excel template](#)

2.0 General Staff

b) a) Learning Path:

vi.   Accessibility fundamentals – [Microsoft training path](#)

vii.   Accessibility for Outlook – [Create accessible email messages in Outlook](#)

Standards for ICT

1.0 Portable Document Format (PDF) Guidelines

When will a PDF be added to our EPCPH website?

The EPCPH Communications Program and those within the agency who have limited access to the EPCPH website will upload a PDF document to the website if the document meets the following criteria:

1. **The document cannot be made into a news story or a landing page on the website.** The best way to get information to the public is to add the information into a content area on either a news story or a landing page on the website. This ensures that search engines can crawl the information and get users the correct information in the fewest clicks possible.
2. **The document exceeds five pages of content.** Content under five pages in length will be made into a webpage if possible. If there are more than five pages associated with a document, then that document will need to be uploaded as an accessible PDF.

2.0 What to do if you have a document that needs remediation

If you have a document that needs remediation, and your division champion is unavailable, please [submit a service request to the Communication Office here.](#)

1. Fill out the Communication Request Form
2. Select PDF Remediation from the service list and submit.
3. You will receive an email confirmation that your request was received by the Communications Program.
4. Communications will then assign a communications team member, and the team member will set up any appropriate follow-up meetings if necessary.
5. The communication team member will then remediate the PDF to become accessible.

3.0 Checklists

3.1 Checklist for Content Contributors

- ✓ **ALT Text:** Add alternative text descriptions to images to help visually impaired users understand the content of the image. The alternative text should be concise, descriptive, and convey the purpose or function of the image.
- ✓ **Videos:** Provide captions and audio descriptions for videos.
- ✓ **Color:** Ensure there is sufficient color contrast between text and background.
- ✓ **Tables:** Ensure that tables on the website are properly marked up with table headings and captions so that they can be navigated using a screen reader.
- ✓ **Headings:** Use headings to organize content and provide a clear structure to the page. Headings should be used in a logical order (H1, H2, H3, etc.), and should accurately reflect the content they are introducing. Avoid using headings for styling purposes only, and don't skip heading levels (e.g. going from H2 to H4 without using an H3 in between).
- ✓ **Language:** Use simple language that is easy to read and understand. Avoid using jargon, complex words, or abbreviations that may be confusing to some users.

3.2 Checklist for Website Administrators

- ✓ **Easy Navigation:** Make sure website is easy to navigate and is easy for users to find what they are looking for.
- ✓ **Input Modalities (Developer's Responsibility):** Provide options to allow users to bypass repetitive content, such as navigation menus, and go directly to the main content of the page.
- ✓ **Readable Content (Developer's Responsibility):** Ensure that the text on the website is easily readable, with a minimum font size of 12pt.
- ✓ **Adaptable Content (Developer's Responsibility):** Ensure that the website can be navigated using only a keyboard and that all functionalities can be accessed through a keyboard.
- ✓ **Compatible with assistive technologies (Developer's Responsibility):** Ensure that the website can be used with a range of assistive technologies, such as screen readers, magnifiers and speech recognition software.

3.3 Checklist for Social Media

- ✓ **Language:** Use simple language that is easy to read and understand. Avoid using jargon, complex words, or abbreviations that may be confusing to some users.
- ✓ **ALT Text:** Alt text describes the content of an image to users who may not be able to see the image. Each social media platform has the capability to add ALT text to images.
- ✓ **Color:** Ensure that images have enough contrast between the background and foreground colors to make it easy to read. WCAG 2.1 recommends a contrast ratio of at least 4.5:1 for normal text and 3:1 for large text.

- **Video:** Captioning videos makes the content accessible to individuals who are deaf or hard of hearing. Automated captions are not always accurate, so it is recommended to review and edit them for accuracy.

3.4 Checklist for Designers

- **Color:** Ensure that there is sufficient contrast between the text and the background to make it easy to read. WCAG recommends a contrast ratio of at least 4.5:1 for normal text and 3:1 for large text. Avoid using color alone to convey meaning. Do not use color alone to convey information or meaning, as some users may not be able to perceive color. Use other visual cues such as icons, text, or patterns to communicate the intended message.
- **ALT Text:** Add alternative text descriptions to images to help visually impaired users understand the content of the image. The alternative text should be concise, descriptive, and convey the purpose or function of the image.
- **Headings:** Use headings to organize content and provide a clear structure to the page. Headings should be used in a logical order (H1, H2, H3, etc.), and should accurately reflect the content they are introducing. Avoid using headings for styling purposes only, and don't skip heading levels (e.g. going from H2 to H4 without using an H3 in between).
- **Tables:** Ensure that tables on the website are properly marked up with table headings and captions so that they can be navigated using a screen reader.
- **Form Field Labels:** Ensure that form fields are properly labeled and associated with their respective labels.
- **Fonts:** Use standard sans-serif fonts for body text. Ornate fonts are hard to read.

3.5 Checklist for Video

- **Captions:** Captioning videos makes the content accessible to individuals who are deaf or hard of hearing. Automated captions are not always accurate, so it is recommended to review and edit them for accuracy.
- **Audio Descriptions:** Provide audio descriptions for all visual content that is important to understand the video. Ensure that the audio descriptions accurately convey the visual content. Ensure that the audio descriptions are synchronized with the video content.
- **Transcripts:** Provide an alternative means of accessing the video content for users who cannot view the video, such as a text-based summary.
- **Flashing:** Ensure that the video does not contain flashing or rapidly changing content that could cause seizures or other health issues.
- **Colors:** Ensure that the video content does not rely solely on color to convey information.

✓ **Navigation:** Provide a way for users to navigate to different sections of the video, such as chapters or bookmarks.

Testing tools

Layover Tool – SiteImprove

El Paso County and EPCPH utilize SiteImprove to give an immediate overview of the public health website compliance levels, which removes the guesswork and provides focus in order to meet current web accessibility standards (WCAG 2.1, AA).

Adobe Pro Accessibility Checker

Adobe Pro Accessibility Checker is a tool within Adobe Acrobat Pro DC that helps users ensure their PDF documents are accessible to people with disabilities. It evaluates the document against accessibility standards such as the Web Content Accessibility Guidelines (WCAG) and the PDF/UA (Universal Accessibility) standard. The Accessibility Checker identifies potential accessibility issues such as missing alternative text for images, improper heading structures, insufficient color contrast, and more.

Color Contrast Checker

Check the contrast between different color combinations against WCAG standards. A color contract checker can be found at the following link: Color Contrast Checker or at https://colourcontrast.cc/.

Perspective Tester

Perspective Tester employs professional testers, some of whom are native AT users, which means they live with a disability that requires them to use assistive technology to navigate the web. These testers provide accessible documents that meet WCAG 2.2 AA guidelines. Perspective Tester has aligned its methods with the requirements put forth by the Department of Justice, prioritizing manual testing as the gold standard to verify a high level of access. EPCPH contracted with Perspective Tester to remediate up to 1,728 pages of critical documents for digital accessibility.

Continual Engine PREP

Continual Engine PREP is a PDF and document remediation platform/solution and services that helps users ensure their PDF documents are accessible to people with disabilities. It is fully compliant with ADA/Section 508/EAA/WCAG 2.2 guidelines. The Accessibility Checker identifies potential accessibility issues such as missing alternative text for images, improper heading structures, improper table or list structures and more. EPCPH holds five Continual Engine PREP licenses.

Accessibility Maturity

To comply with the enactment of HB21-1110 and the latest Colorado Code of Regulations (CCR) regarding technology accessibility, El Paso County Public Health (EPCPH) has undertaken a thorough review and improvement of its digital accessibility policies and procedures. These updated standards build upon and enhance the existing guidelines from Section 508 and Title II, forming the foundation of our goal to ensure a more inclusive digital experience for all community members.

By consistently applying these standards, EPCPH makes every effort to not only meet legal requirements, but also exceed expectations, in delivering an accessible and user-friendly digital environment. In doing so, EPCPH is committed to not only staying aligned with current legal and regulatory frameworks but also setting a high standard for digital accessibility excellence. Specifically, EPCPH has taken the following efforts to date:

- EPCPH provides reasonable accommodations and modifications of policies to accommodate the needs of people with disabilities. There are multiple ways to requestion assistance on the county's website. An Accessibility Statement is available on the county's website that includes this information for residents with disabilities.
- Preparing and transitioning our website to a newly designed site with accessibility features.
- Remediating the website by converting pdfs of accessible formats and/or new webpages. Using SiteImprove to make indicated updates to improve accessibility and quality assurance.
- Provided updated, accessible agency templates (letterhead, email signature, PowerPoint, etc.) to all EPCPH staff.
- Provided multiple staff trainings, training documents and remediation framework to enable the start of the remediation process on document storage repositories (SharePoint, OneDrive, etc.). Staff are prioritizing public-facing documents.
- Entering into a contract with Perspective Tester to ensure document compliance. EPCPH has also purchased five licenses for Continual Engine PREP for staff remediation purposes.
- EPCPH is developing a comprehensive Digital Accessibility Roadmap that documents EPCPH's ongoing good-faith efforts to make information and communication technology fully accessible to our residents with disabilities. This living document outlines both our short- and long-term plans in accessibility.
- EPCPH has developed avenues for notifying vendors and contractors of accessibility requirements.

Accessibility Maturity

Date	Check One	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.
July 1, 2025	X	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.

Progress Since Our Last Update

El Paso County Public Health has taken significant steps to meet digital accessibility requirements, expending considerable staff time and budget dollars.

Progress includes:

- Updated the El Paso County Public Health website by first quarter 2024.
  - Archived webpages that were no longer valid or were outdated.
  - Ensured webpage templates were screen reader friendly and color contrasts were accessible.
  - Moved over public health website content.
  - Archived PDF documents that were outdated and created updated documents for information that was still valid, a form, or a health information sheet.
  - Renamed website categories according to public perception for easier website navigation.
  - Launched new website in February 2024.
- Created an ADA Compliance/Digital Accessibility webpage specific to El Paso County Public Health in September 2024 and provided updates as needed.
  - Outlined a webpage that covers our digital accessibility statement.
  - Ensured the internal process to handle requests is covered at all times.
  - Outlined the process for someone who needs accessibility assistance on the EPCPH webpage by providing a link to an accommodation request form. The page also outlines processes for those who request services. A request form submission is being directed to HealthInfo@elpasoco.com and the existing Communications and Public Relations Supervisor.
  - Added a grievance process.

- o Added the Digital Accessibility Plan to the Digital Accessibility Webpage by July 1, 2025.
- Website remediation process: Converted PDF documents on the website to accessible versions and/or created new web pages with pertinent information. Used SiteImprove make indicated updates to improve accessibility and quality assurance.
  - o Created a system to identify broken links, inaccurate information and pdfs on program pages by asking each program manager to review their pages quarterly and report all issues on a Quarterly Website Update form. Communications team members are then responsible for making all updates.
    - Sent first update in the first quarter 2025.
    - Significant issues were identified and corrected over a period of months.
    - After identifying PDFs, prioritized PDFs according to agency priority areas and either remediated or removed.
    - Next update will be sent in July 2025, and updates will be sent quarterly thereafter.
  - o Purchased Continual Engine PREP licenses to aid in remediation process.
    - Licensed staff completed three trainings with Continual Engine staff and completed multiple self-guided trainings located within the program
  - o Purchased Perspective Tester to aid in remediation process.
    - Sent 869 pages of documents for remediation and posted updated documents.
    - Continuing to send documents for remediation.
  - o Purchased a professional crawl of the website in June 2025 to locate all remaining pdfs on the website and either:
    - Replaced with remediated document.
    - Transferred information to a webpage format.
    - Removed the document by June 30, 2025.
  - o Used SiteImprove to direct changes to website to improve accessibility and quality assurance.
    - On June 25, 2025, the El Paso County Public Health website's Quality Assurance score was 91.2 percent, an increase of 33.9 points over 30 days.
    - On June 25, 2025, the El Paso County Public Health website's Accessibility Score was 88 percent, an increase of 3.6 points over 30 days. The WCAG Level A conformance was rated at 100 percent, and the WCAG AA performance was rated at 85.28 percent. The agency is

working with the website developers to resolve the remaining AA issues.

- Staff training and remediation of storage repositories
    - o All staff was assigned required online classes in making documents accessible for Outlook, PowerPoint, Word and Excel
    - o All programs/divisions provided with training in digital accessibility (a total of eight trainings provided between October 2024 and February 2025)
    - o All programs provided with documents outlining how to make documents accessible
    - o All programs provided with a framework for how to prioritize documents for remediation (with documents that are public-facing and in regular use comprising first priority) and how to track remediated documents.
    - o All program managers provided with accessibility training, including a hands-on demonstration from an Accessibility Champion.
    - o All Accessibility Champions provided with accessibility training, including a hands-on demonstration from an Accessibility Champion
- Vendors and contractors notified on accessibility requirements.
    - o The following clause will be added to all new and renewed El Paso County contracts starting in June 2025:
      Accessibility. Should the Contractor provide a service which provides information and communication technology (ICT), the Contractor shall make commercially and technologically reasonable efforts to comply with all applicable provisions of C.R.S. §24-85-101, et seq., and the Accessibility Standards for Individuals with a Disability as established by the Governor's Office of Information Technology (OIT) pursuant to Section C.R.S. §24-85-103 (2.5). Contractor shall also make commercially and technologically reasonable efforts to comply with all State of Colorado technology standards related to technology accessibility and with Level AA of the most current version of the Web Content Accessibility Guidelines (WCAG), incorporated in the State of Colorado technology standards. The Contractor who provides ICT will also procure and provide an accessibility and compliance report utilizing the current ITIC Voluntary Product Accessibility Template (VPAT 2.5Rev WCAG) and/or manual testing reports from a qualified testing company to demonstrate reasonable efforts to comply with all State of Colorado technology standards.
    - o Vendors were also provided a letter explaining requirements entitled, "Update to Information Technology Compliance per Colorado House Bill 21-1110, Title II ADA regulation 28 CFR Part 35 Subpart H—Web and Mobile Accessibility, and Section 504 of the Rehabilitation Act of 1973, 89 FR 40066 Subpart I—Web, Mobile, and Kiosk Accessibility"

- Consolidated 91 agency SharePoints to 39 agency SharePoints. This reduces the locations where documents are stored and ensures that programs and divisions are addressing all of their documents in their plans.
- Created a policy and procedure for any documents or technologies that fall under the Undue Hardship, Undue Burden, Fundamental Alteration, or Direct Threat classification. Created a system for tracking these documents and technologies, and a system for notifying all parties of the process for requesting documents or technologies in an accessible format.

Challenges include:

- Limited budget for purchases within the Communications Program:
  - $1,200 annual budget for professional development
  - $3,500 in one-time funding for software for the Communications Program (budget used in its entirety for remediation software)
  - $21,500 in one-time funds for other professional services (the majority of this budget was allocated to professional remediation services)
- The Communications and Public Relations Supervisor is currently managing website, documentation and communications.
- Remediation is complex and requires training and practice. Many staff members are still learning.
- Public Health comprises dozens of programs with differing document needs. Many documents are very large.
- State and federal grants and funding often require the disbursement of documents created at the federal or state level that are not accessible.
- Legal requirements for documents may require scanning signed documents and emailing them.

How We Are Implementing Accessibility

EPCPH is committed to providing equitable access to all Coloradans. To that end, EPCPH has a plan to prioritize, evaluate, remediate and continuously improve digital touchpoints within our services, programs and activities. We are incorporating accessibility into our day-to-day work. Below, you'll find some of the measures that EPCPH is undertaking.

- **Define an accessibility roadmap including timeline, goals, roles, responsibilities and policies as needed.** After completing our initial plan, EPCPH is working to develop a guidance document for improvements in the year ahead.
- **Create and implement a plan for providing reasonable accommodations and modifications, which includes preparing our staff to respond to requests for assistance.**

- **Continue to train employees on providing accessible services, documents and technology.**
- **Incorporate accessibility requirements in the design, development, user experience and quality assurance of the technology, documents and communications we develop.**
- **Conduct and maintain an inventory of technology and then prioritize, test and address accessibility issues.**
- **We prioritize the order to address technology assets by determining if they are public-facing and understanding the frequency that they are share electronically.** We prioritize all public-facing documents, but particularly those that enable people to perform key tasks, like registering for programs; searching for things; submitting forms, requests, or reservations; paying bills; or making purchases. We prioritize all documents that are frequently shared electronically, but particularly those that are important for accessing essential government programs. Our priorities are listed as:

    - Priority 1: documents that are public-facing and frequently shared electronically = Test/remediate first.
    - Group 2: Documents and digital communications which are important but won't be used until a later date = Test/remediate next. Plan accommodations first.
    - Group 3: Documents that are update infrequently but are still valuable and useful to have on hand = Test/remediate after Group 2. Plan accommodations next.
    - Group 4: Documents no longer being utilized. = Test/remediate last. Put accommodations in place last.
- Additionally, and item may move into a higher priority position if it:
    - Has been flagged as inaccessible by individuals with disabilities.
    - Is newly in development, so that EPCPH can avoid creating new barriers.
    - Appears across multiple web pages, like navigation menus, search features, and standardized footers.
    - Is based on a template. EPCPH prioritizes using accessible templates.

Formal Approval

DeAnn Ryberg, Interim Executive Director of El Paso County Public Health

Approved June 27, 2025/Last Updated June 30, 2025