



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 Office

Contents

Overview of Colorado House Bill 21-1110 (HB21-1110) Laws for Persons with Disabilities	2
Our Digital Accessibility Statement	3
El Paso County Public Health ADA Digital Accessibility Procedure	4
1.0 General	4
2.0 Purpose and Scope	4
3.0 Terms Defined	5
4.0 Procedures	6
5.0 Miscellaneous	6
6.0 Procedure Statement.....	6
7.0 Roles and Responsibilities	6
Undue Burden, Fundamental Alteration, or Direct Threat	8
Procedure to Request Reasonable Accommodations, Modifications, or to Report Inaccessible Information/Technology	8
Timeline to Request Reasonable Accommodation, Modification, or to Report Inaccessible Information/Technology	9
Division Accessibility Champions	9
Staff Training Requirements	9
1.0 Authors of Documents intended for public use.....	10
2.0 General Staff.....	10
Standards for ICT	10
1.0 Portable Document Format (PDF) Guidelines	10
2.0 What to do if you have a document that needs remediation	11
3.0 Checklists	11
Testing tools	13

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 access to all 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 ensure 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 Public Health 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. Any material that does not comply will be evaluated and listed under the El Paso County Public Health Undue Hardship, Undue Burden, Fundamental Alteration, or Direct Threat Policy.
- 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 will work to ensure 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 and update EPCPH's Digital Accessibility Compliance Plan.
- b) Maintain 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 and implement accessibility standards.
- f) Work with County procurement office, which is responsible for providing accessible procurement guidelines.
- 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 ECPH Communications Program.

Undue Burden, Fundamental Alteration, or Direct Threat

ECPH 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 follow the El Paso County Public Health Undue Hardship, Undue Burden, Fundamental Alteration, or Direct Threat Policy. Steps will include, but are not limited to:

- **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 ten Continual Engine PREP licenses.

Formal Approval

A handwritten signature in black ink, appearing to read "DeAnn Ryberg". The signature is fluid and cursive, with the first name "DeAnn" and last name "Ryberg" clearly distinguishable.

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

Approved June 26, 2026/Last Updated June 26, 2026