



# Technology Accessibility Plan

## Table of Contents

Revisions .....	2
Introduction.....	3
Overview of Colorado Laws for Persons with Disabilities.....	3
Annual Status Update.....	3
Current Digital Service Inventory Prioritization.....	5
Timeline for Addressing Inaccessible ICT.....	10
Steps for Removing Accessibility Barriers .....	12
Status of Steps for Removing Accessibility Barriers .....	14
Evaluation, Testing Tools, and Remediating Process .....	20
Exhibit A: ADA Grievance Procedure.....	23

# Revisions

The City of Cherry Hills Village shall update the Technology Accessibility Plan whenever necessary and shall periodically review the plan. All finalized revisions will be recorded below in the Record of Revisions.

## Record of Revisions

Revision Number	Date	Completed by	Section(s) Revised
1	2/4/2025	Kathryn Ducharme	Annual Status Update, Timeline for Addressing Inaccessible ICT, Status of Steps for Removing Accessibility Barriers

## Introduction

The City of Cherry Hills Village (the “City”) is committed to providing online services that are accessible to the widest possible audience, regardless of technology or ability. The City strives to ensure that all of its Information and Communication Technology (“ICT”) achieves “Level AA” conformance under the Web Content Accessibility Guidelines v2.1 (“WCAG 2.1”).

The City’s Accessibility Plan (the “Plan”) details the City’s long-term strategic approach to continue improvements to the accessibility of City ICT. The Plan includes:

- An overview of the Colorado web accessibility requirements.
- Annual Status Updates on the accessibility of the City’s ICT.
- Current Digital Service Inventory Prioritization.
- Timeline for Addressing Inaccessible ICT.
- Steps for Removing Accessibility Barriers
- Status of Steps for Removing Accessibility Barriers
- Evaluation, Testing Tools, and Remediating Procedures
- Grievance Procedures

## Overview of Colorado Laws for Persons with Disabilities

On June 30, 2021, House Bill 21-1110, “Colorado Laws for Persons with Disabilities” was enacted. The Act strengthened the then-existing law protecting persons with disabilities by specifically stating that governments must ensure all persons, regardless of disability, have access to the government’s ICT. Specifically, the Act prohibits 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.

## Annual Status Update

This section contains the City’s annual status update, including goals for the current year and for the next year.

### **Annual Status Update Statement:**

The City will release an annual accessibility status update every June to comply with the Act, as well as any additional current or future federal regulations.

### **2024 Accessibility Accomplishments:**

1. Completed Technology Accessibility Plan.
2. Completed Technology Accessibility Statement and posted on all front-facing webpages.
3. Budgeted web accessibility improvements in the 2025 City Budget, including \$5,000.00 specific to training and \$30,000.00 for technical assistance towards audit and remediation services. Funds for technical services currently assigned:
  - a. \$3,000.00 external website accessibility audit and test services

- b. \$8,000.00 PDF remediation services
- 4. Audited and tested 75% of external-facing City webpages for accessibility issues and barriers.
- 5. Remediated Portable Document Format (PDF) on City websites.
  - a. Provided applications and forms in multiple formats.
  - b. Transferred information from PDFs to website text where applicable.
  - c. Utilized accessibility software for Microsoft and Adobe to create accessible PDFs.
  - d. Utilized accessibility software for Microsoft and Adobe remediation services on existing PDFs.
- 6. Created Accessibility Committee composed of City staff who are web authors/content creators.
- 7. Trained City staff web authors/content creators in Accessibility standards.
- 8. Provided quarterly progress reports.

#### **2025 Accessibility Goals:**

- 1. Review and update the Technology Accessibility Plan.
- 2. Post report for accessibility items accomplished in 2024.
- 3. Provide City Council with a Web Accessibility update.
- 4. Quarterly Accessibility Committee meetings.
- 5. Quarterly progress reports.
- 6. Continue auditing and testing external-facing City webpages for accessibility issues and barriers.
- 7. Identify any changes to the Information and Communication Technology (ICT) list of vendors from 2024 to 2025.
- 8. Retain contract services for an Accessibility Assessment and Remediation Services vendor(s).
  - a. Evaluate vendor recommendations with 2025 budget parameters and plan for 2026 budget items.
  - b. Determine internal accessibility duties and responsibilities between City staff, City contracted Information Technology vendor (Bross Group), and third party software/website providers.

## Current Digital Service Inventory Prioritization

The below table lists all of the external-facing ICT owned or used by the City, in order of priority, with an explanation of the steps currently being (or that are planned to be) taken to make such ICT accessible.

External ICT	Priority Level	Steps towards Accessibility
Xpressbillpay.com	High	In progress since 2/6/24; Vendor development is working on tools to meet compliance.
CivicPlus	High	Audit complete; assessment in progress; certificate requested 6/7/24
ClearGov	High	Response from vendor stating their tools are all WCAG 2.1, Level AA compliant. Will request document to this effect.
AudioEye	High	Accessibility overlay software - Complete
MuniCode	High	Audit/assessment in progress; certificate requested 6/7/24
Open Media	High	Need to review with company and agreement
YouTube	High	Used with Open Media account; need to review
Plow Ops	High	Need to review with company
ArcGIS ESIR	High	New software just added, have not begun to use for City maps.
CivicGov Community Development Citizen Portal	High	Audit complete; assessment in progress; certificate requested 6/7/24
Crimewatch	High	Audit complete; assessment in progress
Lexus Nexus	High	Platform will be replaced with Carfax
Arapahoe County Victim Assistance Services	High	<a href="https://www.arapahoeco.gov/your_county/county_departments/information_technology/technology_accessibility.php">https://www.arapahoeco.gov/your_county/county_departments/information_technology/technology_accessibility.php</a>

Arapahoe County Court	High	<a href="https://www.arapahoeco.gov/your_county/county_departments/information_technology/technology_accessibility.php">https://www.arapahoeco.gov/your_county/county_departments/information_technology/technology_accessibility.php</a>
Rocky Mountain BidNet/E-Purchasing System	High	<a href="#">BND-24.05.0_VPAT2.4RevWCA G.pdf (hubspotusercontent-nal.net)</a>
Zoom	High	<a href="https://www.zoom.com/en/accessibility/">https://www.zoom.com/en/accessibility/</a>
Logix on Cloud	High	Need to review; electronic sign board
Adobe	High	CommonLook software tool for front facing documents
Microsoft	High	CommonLook software tool for front facing documents
Google Forms	High	Need to review
Instagram	High	<a href="https://developers.facebook.com/docs/threads/posts/accessibility/">https://developers.facebook.com/docs/threads/posts/accessibility/</a>
Facebook	High	<a href="https://developers.facebook.com/docs/threads/posts/accessibility/">https://developers.facebook.com/docs/threads/posts/accessibility/</a>
NextDoor	High	
Drop Box	High	
SurveyMonkey	High	<a href="https://help.surveymonkey.com/en/surveymonkey/create/accessibility/">https://help.surveymonkey.com/en/surveymonkey/create/accessibility/</a>
High Line Canal Conservancy	Low	Member of conservancy, separate entity
DRCOG	Low	<a href="https://www.drcog.org/access">https://www.drcog.org/access</a>
ArapaMap	Low	<a href="https://www.arapahoeco.gov/your_county/county_departments/information_technology/technology_accessibility.php">https://www.arapahoeco.gov/your_county/county_departments/information_technology/technology_accessibility.php</a>
Arapahoe County E 911	Low	<a href="https://www.arapahoeco.gov/your_county/county_departments/information_technology/technology_accessibility.php">https://www.arapahoeco.gov/your_county/county_departments/information_technology/technology_accessibility.php</a>
South Metro Fire Rescue	Low	<a href="https://www.southmetro.org/accessibility">https://www.southmetro.org/accessibility</a>
Carfax	High	Not in place yet.

Denver Water	Low	<a href="https://www.denverwater.org/contact/accessibility">https://www.denverwater.org/contact/accessibility</a>
Lakota Ride	Low	Need to review
Flu Shot Clinic	Low	Need to review with outside provider. Most information is HTML form on City website.
Colorado Department of Public Health and Environment	Low	<a href="https://cdphe.colorado.gov/accessibility">https://cdphe.colorado.gov/accessibility</a>
Splashco.org	???	
Colorado Stormwater Council	???	
Centennial Airport Noise Management	???	
Lots of links to outside websites: <a href="https://www.cherryhillsvillage.com/296/Community-Resources">https://www.cherryhillsvillage.com/296/Community-Resources</a>	???	Need to review
Cherry Hills Land Preserve ( <a href="http://quincyfarm.org">quincyfarm.org</a> )	???	

The below table lists all of the internal-facing ICT owned or used by the City, in order of priority, with an explanation of the steps currently being (or that are planned to be) taken to make such ICT accessible. Review and updates to this list are a goal for 2025.

<b>Internal ICT</b>	<b>Priority Level</b>	<b>Steps towards Accessibility</b>
Caselle	Moderate	Need to have a discussion with vendor
LaserFiche	Moderate	Need to have a discussion with vendor
Doculivery	Moderate	Need to have a discussion with vendor
Caselle Connect Online	Moderate	Need to have a discussion with vendor
Wells Fargo Bank	Moderate	Need to have a discussion with vendor
Doodle Poll	Moderate	Need to have a discussion with vendor
Employee Navigator	Moderate	Need to have a discussion with vendor
Concentra	Low	
Street Scan	Low	
Fuel Cloud	Moderate	Need to have a discussion with vendor
HealthOne	Low	
Background Information Services Inc	Low	
Colorado Interactive	Low	
Kaiser Permanente portal	Low	
Principal Insurance portal	Low	
EyeMed Vision portal	Low	
Mutual of Omaha portal	Low	
Rocky Mountain Reserve COBRA	Low	
Rocky Mountain Reserve portal	Low	
Optum Bank	Low	
Aflac portal	Low	
MissionSquare Retirement portal	Low	
Fire & Police Pension Association (FPPA) portal	Low	
Colorado Unemployment/Tax reporting	Low	
Colorado New Hire Reporting	Low	
Colorado Tax Withholding	Low	
Federal Tax Reporting	Low	
Colorado Intergovernmental Risk Sharing Agency (CIRSA)	Low	
Pinnacol Assurance	Low	
DocuSign	Low	



Signup Genius	Low	
PowerDMS	Low	
KnowB4	Low	
Splashtop Streamer	Low	
Webroot	Low	
RMM datto	Low	
BlueBeam	Low	
iTunes	Low	
CommonLook	Low	
VMWare	Low	
APWA Self-Assessment online software	Low	
Jamf	Low	

# Timeline for Addressing Inaccessible ICT

The timeline for addressing HIGH priority ICT is as follows:

1. Complete accessibility audit of the following website pages by March 15, 2025.  
(86% complete as of January 31, 2025):
  - a. Main City website through CivicPlus complete: [www.cherryhillsvillage.com](http://www.cherryhillsvillage.com)
    - i. Third party testing by WebAIM completed 100% test on the main City website. 364 total webpages tested.
    - ii. City received report from WebAIM (Utah State University organization) on January 2, 2025. Report included:
      1. Automated accessibility score
      2. Manual accessibility impact score
      3. Total AIM score and report
  - b. Police Department website through Crimewatch complete:  
<https://crimewatch.net/us/co/arapahoe/cherry-hills-village-pd>
    - i. Third party testing by WebAIM completed 100% test on the Police Department website. 55 total webpages tested.
    - ii. City received report from WebAIM on January 29, 2025.
  - c. Community Development Department building permit website called Citizen Portal through CivicPlus:  
[https://www.civicgov4.com/co\\_cherryhillsvillage/portal/index.php](https://www.civicgov4.com/co_cherryhillsvillage/portal/index.php)
    - i. Third party testing by WebAIM completed 100% test on the building permit website. 6 total webpages tested.
    - ii. City received report from WebAIM on February 10, 2025.
  - d. City Budget document website through ClearGov:
    - i. 2023 Budget document: <https://city-cherry-hills-village-co-budget-book.cleargov.com/8260/welcome/welcome>
    - ii. 2024 Budget document: <https://city-cherry-hills-village-co-budget-book.cleargov.com/14998/welcome/welcome>
    - iii. 2025 Budget document: <https://city-cherry-hills-village-co-budget-book.cleargov.com/19599/welcome/welcome>
  - e. City Recruitment website through Teamtailor: [careers.cherryhillsvillage.com](http://careers.cherryhillsvillage.com)
  - f. Home Rule Charter and Municipal Code website through MuniCode:  
[https://library.municode.com/co/cherry\\_hills\\_village/codes/municipal\\_code](https://library.municode.com/co/cherry_hills_village/codes/municipal_code)
2. Present WebAIM findings to the Accessibility Committee. The quarterly Accessibility Committee meeting is Thursday, March 13, 2025.
  - a. Review and determine a schedule, assign tasks/responsibilities, and the process for remediation from the WebAIM reports.
3. Complete remediation of active-use PDF documents on City website by July 1, 2025. Staff allocated \$8,000.00 of the budgeted funds for web accessibility to PDF remediation in 2025.

4. Obtain Voluntary Product Accessibility Templates (VPATS), Accessibility Conformance Report (ACR) and/or statements of conformance with accessibility standards from third-party vendors.
  - a. City will provide a list of VPATs or ACRs obtained and continue to update the status of those in the ICT prioritization list.
  - b. Discuss VPATs with Departments Accessibility members at a quarterly Accessibility Committee meeting to review the ICT list to assign appropriate priority level and get contact information. Moderate and Low priority ICT will be further addressed in 2025 when the City contracts with a third-party vendor for accessibility assessment and remediation services. This section will be updated in February 2025.

## Steps for Removing Accessibility Barriers

In 2023, the City began the process to remove accessibility barriers from the City's website. The primary focus started with the external, front facing ICT. The City will create a policy and plan for internal ICT after addressing external ICT accessibility issues.

### **Step 1: Initial Assessment of City ICT Accessibility:**

- Identify point personnel and accountable party.
- Identify web content authors.
- Identify City website users to anticipate issues.
- Audit of front facing web pages for several items including:
  - Headings
  - Acronyms and abbreviations
  - Font, use of CAPS, italics, etc.
  - Images for alternative text
  - Links
  - Use of colors
  - Form requirements
  - CAPTCHAs
- Identify website documents, specifically Portable Format Documents (PDFs), for accessibility. Set up plan and timeline for remediation.
  - Send third party vendor Allyant/CivicPlus list of PDF documents for accessibility remediation according to Professional Services Agreement.
- Audit City social media use including providers and assess accessibility needs going forward for each platform.
- Obtain Voluntary Product Accessibility Templates (VPATs) and/or statements of conformance with Accessibility standards from third-party vendors.

### **Step 2: Define and Develop City Processes:**

- Create Technology Accessibility Statement: create a clear, easy to find process for requesting redress for an inaccessible digital product, including contact options that are not dependent on web access or digital accessibility.
  - The Statement is prominently displayed on all front facing web pages.
  - The Statement is available in multiple formats. Create Technology Accessibility Plan. The Plan is posted on the website.
- Identify training for point personnel and accountable party.
- Identify training for web content creators/authors.
- Create Accessibility Committee to meet once per quarter.
  - Establish accessibility roles and responsibilities organization wide.
  - Establish governance criterion for policies and procedures organization wide.
- Schedule basic awareness training for all departments to understand the “what and why” of the City's accessibility goals and progress.
- Schedule quarterly progress reports for City Manager and Directors in staff meetings.

**Step 3: Establish City Processes:**

- Establish policy and procedures for consistent accessibility compliance for future web content, social media posts, and website documents.
- Establish policy and procedures for accessibility compliance for authoring tools added to the website including PowerPoint presentations, Word documents, Excel documents, etc.
- Identify and train appropriate staff on adopted policies and procedures.
- Create Request for Proposal (RFP) for outside vendor to conduct an accessibility assessment and remediation services.

**Step 4: Measure/Reassess City Accessibility:**

- Create survey for public input and to continually assess best methods and practices for public assessment of City website accessibility.
- Review and update Digital Services Inventory list; remove vendors no longer working with, add new vendors.
- Review what is working, what needs more attention?
- Review policies and procedures; did they accomplish their purpose and create consistent compliance with accessibility standards?

# Status of Steps for Removing Accessibility Barriers

## Step 1: Initial Assessment of City ICT Accessibility:

- **Identify point personnel and accountable party.**

Ongoing.

Current Point People:

- City Clerk
- Human Resources (HR) Manager/Americans with Disabilities Act (ADA) Coordinator

- **Identify web content authors.**

Completed June 3, 2024.

City has six (6) main web content authors/creators including:

- Building & Planning Permit Technician, Community Development
- City Clerk, Administration
- Municipal Court Clerk, Administration
- Parks Project and Operations Manager, Public Works
- Police Technician, Police
- Public Works Clerk, Public Works

- **Identify City website users to anticipate issues.**

Ongoing.

City users are made up of several groups. Everyone benefits when the City's website and ICT is focused on enhancing user experience, usability and user-centered design. This includes keeping in mind people with slow internet connection or limited bandwidth, people with situational limitations, people with temporary disabilities and older people with changing abilities due to age. Disability comes from aging and most who live long enough will experience decrease in visual, hearing, physical, and/or cognitive abilities, etc.

City website users have a range of abilities. Web accessibility encompasses all disabilities that affect access to the web including:

- Auditory
- Cognitive
- Neurological
- Physical
- Speech
- Visual
- Reduced dexterity

It's important to be aware of the range of hearing, sight, movement, cognitive ability, etc.

- **Audit of front facing web pages:**

In progress. Estimate date of completion March 15, 2025.

- **Identify website documents, specifically Portable Format Documents (PDFs), for accessibility. Set up plan and timeline for remediation.**

- **Send third party vendor Allyant/CivicPlus list of PDF documents for remediation.**

Completed May 20, 2024.

Status update as of August 26, 2024:

There are 74 active-use PDF documents on the City's website.

26 active-use PDF documents remediated:

- Modification of 3 PDF documents to text or imbedded forms on the City's website.
- 23 PDF documents remediated by Allyant.
- 5 PDF documents in review with Allyant for remediation.

Provide an update for the timeline on the rest of the PDF documents to be complete March 31, 2025. Staff has allocated \$8,000.00 for remediation services through Allyant.

- **Audit City social media use including providers and assess accessibility needs going forward for each platform.**

No start date. Review with Accessibility Committee now that web accessibility training is complete.

- **Obtain Voluntary Product Accessibility Templates (VPATs) and/or statements of conformance with Accessibility standards from third-party vendors.**

No start date.

## **Step 2: Define and Develop City Processes:**

- **Create Technology Accessibility Statement: created a clear, easy to find process for requesting redress for an inaccessible digital product, including contact options that are not dependent on web access or digital accessibility. The Statement is prominently displayed on all front facing web pages. The Statement is available in multiple formats.**

Completed June 28, 2024.

Technology Accessibility Statement completed May 24, 2024.

Prominently displayed on all front-facing web pages completed on June 28, 2024.

- **Create Technology Accessibility Plan. The Plan is posted on the website.**

Complete.

Technology Accessibility Plan draft completed June 7, 2024.

First review by City Clerk completed June 10, 2024.

Second review by Directors and web content creators completed June 14, 2024.

Third review by City Clerk and Human Resources Manager completed June 17, 2024.

New draft created July 11, 2024, upon completion of two (2) day web accessibility training through WebAIM. Draft completed August 30, 2024.

Review and approval from City Attorney office on September 9, 2024.

Final draft completed on September 18, 2024.

Posted on the City website on September 19, 2024.

Revised February 5, 2025. Updated posted February 12, 2025.

- **Identify training for point people and accountable party.**

National ADA Virtual Symposium through the Great Plains ADA Center

Completed May 6-7, 2024.

Attended by Human Resources Manager, several Web Accessibility sessions including totaling six (6) hours of training:

- Check! Basic Digital Access in Action
- From 2- 200: Developing an Organization-Wide Digital Accessibility Team
- 7 Ways to Make Content Digitally Accessible
- Sustaining Digital Accessibility: Empowering Content Creators and Editors

Web Accessibility Training through CivicPlus, City website host provider

Completed May 28, 2024.

Three (3) hour training attended by Human Resources Manager.

Intro to CommonLook Office in Microsoft Word (authoring tool) accessibility software training through Allyant

Completed June 5, 2024.

One and a half (1.5) hours attended by City Clerk and Human Resources Manager.

Building a Sustainable Accessibility Program training through Sky Scanner

Completed June 12, 2024.

One (1) hour webinar attended by HR Manager.

CommonLook Office and PowerPoint (authoring tool) accessibility software training through Allyant

Completed June 12, 2024.

One (1) hour attended by Human Resources Manager.

Web Accessibility Training through Utah State University by WebAIM.

Completed July 10, 2024.

Assign Virtual Web Accessibility Training provided by WebAIM (two (2) day course) to Human Resources Manager/ADA Coordinator.

- Three (3) hour consulting credits available to use after training within a four (4) month timeframe. Complete by November 10, 2024.



Building Trust and Transparency through Web Accessibility Training through CivicPlus,  
City website host provider  
Completed August 13, 2024.  
One (1) hour training attended by Human Resources Manager.

WebAIM Web Accessibility in Mind Conference through Utah State University  
Completed August 27-28, 2024.  
Assign Virtual Web Accessibility Training provided by WebAIM (two (2) day course) of  
three (3) hours each to Human Resources Manager/ADA Coordinator.

WebAIM Accessibility in Technology Procurement and Use training through Utah State  
University  
Completed September 10, 2024.  
Three (3) hour training attended by Human Resources Manager.

Government Innovation Conference  
Completed October 7, 2024  
Six (6) hours completed, attended by City Clerk, sessions included:

- The State of Information Technology: Colorado Governor's Office of Information Technology
- AI, Accessibility, and Adobe: the A List
- How to Create an Accommodation Plan: Lessons Learned and Processes

Colorado Municipal League Webinar: The Ins and Outs of Digital Accessibility  
Completed January 14, 2025  
One (1) hour training attended by City Clerk

Colorado Municipal League Webinar: How to Review your Website for Accessibility  
Improvements  
Completed January 28, 2025  
One (1) hour training attended by City Clerk

- **Identify training for web content authors.**

Introduction to Web Accessibility through Edx.org by W3C.  
Complete. Each staff member assigned the training completed it by January 3, 2025.  
Vetting of training completed by HR Manager/ADA Coordinator on August 26, 2024.  
Assign self-pace training provided by W3C Web Accessibility Initiative (WAI, W3C.org)  
for web content creators.

- Assign by September 20, 2024.
- Complete by December 31, 2024.
- The course is designed to take about 16-20 hours to complete.

- **Create Accessibility Committee to meet once per quarter.**

Ongoing.

First meeting was held on September 19, 2024. A second meeting was held on December 12, 2024.

Quarterly meetings for 2025 are scheduled for:

1. March 13, 2025
2. June 12, 2025
3. September 11, 2025
4. December 11, 2025

Quarterly report given to leadership team after review during staff meetings.

- **Establish accessibility roles and responsibilities organization wide.**

No start date. 2025 goal for Accessibility Committee and Leadership team.

- **Establish governance criterion for policies and procedures organization wide.**

No start date. 2025 goal for Accessibility Committee and Leadership team.

- **Schedule basic awareness training for all departments to understand the “what and why” of the City’s accessibility goals and progress.**

In progress.

Videos have been selected for staff. Web accessibility awareness videos were sent out to the Accessibility Committee as an introduction to the committee:

- Perspectives
- Standards and benefits
- User stories
- Older user stories

Need to identify timing of dissemination with the Accessibility Committee to all staff

- **Schedule quarterly progress reports for City Manager and Directors in staff meetings.**

Ongoing.

### **Step 3: Establish City Processes:**

- **Establish policy and procedures for consistent accessibility conformance for future web content, social media posts, and website documents.**

Ongoing.

City Clerk began accessibility authoring tool templates in Word documents for City Council meetings. Completed August 21, 2024.

- **Establish policy and procedures for accessibility conformance for authoring tools added to the website including PowerPoint presentations, Word documents, Excel documents, etc.**

In progress for City Council documents posted to website.

Review with Accessibility Committee in March 2025 meeting.

2025 goal. Review and identify all other regularly created and posted documents.

- **Identify and train appropriate staff on adopted policies and procedures.**

Dependent on tasks listed above.

- **Create Request for Proposal (RFP) for outside vendor to conduct an accessibility assessment and remediation services.**

In progress.

This item has been delayed after careful consideration. The City has gained more information after using WebAIM's services. With the number of webpages to review, staff determined that an audit could not be completed within a reasonable time by City staff alone. By working with WebAIM, the City has received reports on the current accessibility issues and will determine from those reports how to remediate by reviewing with staff including:

1. Web content: responsible party is City staff
2. Website code issues: responsible parties are website hosts which may include: CivicPlus, Teamtailor, Crimewatch, and Cleargov.

#### **Step 4: Measure/Reassess City Accessibility:**

- **Create survey for public input and to continually assess best methods and practices for public assessment of City website accessibility.**

No start date. 2026 goal.

- **Review Digital Services Inventory list for vendors no longer working with, or adding new vendors.**

No start date. Revisit in 2025.

- **Review what is working well, what needs improvements?**

As noted above staff recognized the scope of completing an internal audit and review of City webpages was too great of a task to finish in a reasonable timeframe. We found a service that would complete the work for the City in a much faster timeframe.

Staff will use the report to determine the best steps for remediation.

- **Review policies and procedures; did they accomplish their purpose and create consistent conformance with accessibility standards?**

2026 goal.

## Evaluation, Testing Tools, and Remediating Process

The City will utilize a variety of tools, processes, and approaches to assist in identifying digital barriers and/or provide another way or manner to access the information.

Below is the process the City will use for:

- 1) Testing ICT for accessibility.
- 2) Remediation when a complaint about inaccessible ICT is received.
- 3) Remediation on the priority list.

### **1) Testing ICT for accessibility:**

Several methods of testing will be used for external and internal ICT.

Manual and automated evaluations or testing of the City's front facing website pages will be conducted with tools and resources listed below. The Human Resources Manager/ADA Coordinator will conduct these tests on all 395 City webpages for a variety of uses and issues. The City will review various user experiences from desktop, mobile and tablet devices as well as from software provider perspectives offered by both Microsoft and Apple.

The City will review and test internal ICT with the help of a third-party vendor. This will take place in 2025 and this section is anticipated to be updated with more information by March 2025.

The City will test for accessibility principles in WCAG including:

- A. Text alternatives, i.e. graphical and non-text objects, images, buttons, form controls
- B. Time-based media, i.e. content dependent on time, media including audio-only files, video-only files, and video plus audio files
- C. Adaptable content, i.e. simpler layout, different ways to present information without losing information or structure
- D. Checking structure, i.e. headings, tables and lists
- E. Distinguishable content, i.e. separating foreground from background, contrast ratio
- F. Keyboard accessible
- G. Physical reactions/Enough time to view information
- H. Navigable content, i.e. page titles, providing more structure and semantics
- I. Input modalities, i.e. touch activation, voice recognition and gestures
- J. Readable content, i.e. primary language, simple language
- K. Predictable content, i.e. consistent appearance or behavior of content
- L. Input assistance, i.e. good instructions for forms, good labels for buttons or controls
- M. Compatible content with assistive technologies, i.e. magnification, screen readers, speech recognition software

Tools to generate automated reports to review City webpages include:

- A. Google PageSpeed Insight
- B. Google Lighthouse Report
- C. Web Accessibility Evaluation Tool WAVE browser extension
- D. Web Developer Google Chrome browser extension

Manual testing of each webpage will occur using several tools:

- A. Screen reader: NVDA
- B. VoiceOver for Mac and iOS
- C. WebAIM Contrast Checker

Additional tools on the City's website to enhance access are:

- A. Monsido AudioEye overlay
- B. Google Translate

## **2) Remediation when a complaint about inaccessible ICT is received:**

There are different processes for external and internal complaints. External complainants will have several ways to get in contact with City staff and those methods are all listed below, as well as on the City's website under the Technology Accessibility Statement.

### **For external complaints:**

We welcome feedback on the accessibility of the City's website and have provided several methods for notifying the City when accessibility barriers are encountered on the City's website.

There are two different form formats for submitting an issue on the City's website including an HTML form and a link and QR code to a Microsoft form. A phone number, email address and the physical address are listed as alternative methods for contacting the City.

The City will evaluate the issue to determine if it is a content issue or a coding issue. Website coding issues are remediated by the City website hosts: CivicPlus and Crimewatch. They may have a different timeframe for fixing issues, but the City will work them to resolve the issue and keep the complainant updated on the situation and timeframe. The City will also work to find alternative ways to provide the information if possible. Regardless of who needs to complete the remediation the City will contact the person who submitted the issue or their designee to discuss the situation within three (3) business days.

If the person is not satisfied with the suggested solution(s), they may follow the City's Americans with Disabilities Act (ADA) Grievance Procedure. The ADA Grievance Procedure is on the City's website. A copy is also attached as Exhibit A below.

### **For internal complaints:**

Internal complaints will need to follow the City Employee Handbook complaint procedures. If it is an internal Information Technology (IT) issue, employees should contact Bross Group at [help@brossgroup.com](mailto:help@brossgroup.com) for assistance first and if the issue cannot be addressed, please refer to the City Employee Handbook complaint procedures.

## **3) Remediation on the priority list:**

Remediation of external ICT is high on the City's priority list. The City has begun remediation efforts in several different areas to address issues first before they are brought to our attention.

While auditing the City's website, accessibility issues have already been resolved. The City has also started remediating key City documents for accessibility. Remediating has been completed in real time as issues have been identified.

Examples include:

- Quick Link button labels that did not read accurately with screen reader or VoiceOver tools were identified on August 22, 2024, and remediated the content button on August 22, 2024. Website host provider is looking into fixing the code on their end to allow for more characters as of notification on August 27, 2024.
- Changed the search bar from "Search..." which read out loud "Search ellipse ellipse ellipse" to "Search our site." The new label provides more information. The coding was identified on August 22, 2024, and changed by the Website Host the same day of the request.

## Exhibit A: ADA Grievance Procedure

### City of Cherry Hills Village Grievance Procedure Under the Americans with Disabilities Act and Section 504 of the Rehabilitation Act

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 (“ADA”), as amended, and Section 504 of the Rehabilitation Act of 1973. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Cherry Hills Village. The City’s Employee Handbook governs employment-related complaints of disability discrimination. City employees are asked to refer to the Employee Handbook and follow the procedures outlined therein.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or their designee as soon as possible but no later than sixty (60) calendar days after the alleged violation to:

**Kathryn Ducharme, Human Resources Manager**  
ADA Coordinator  
2450 East Quincy Avenue  
Cherry Hills Village, CO 80113  
**(303)783-2754**  
[adacoordinator@cherryhillsvillage.com](mailto:adacoordinator@cherryhillsvillage.com)

Within fifteen (15) calendar days after receipt of the complaint, the ADA Coordinator or designee will meet with the complainant to discuss the complaint and the possible resolutions. Within fifteen (15) calendar days of the meeting, the ADA Coordinator or designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City of Cherry Hills Village and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator or designee does not satisfactorily resolve the issue, the complainant and/or their designee may appeal the decision within fifteen (15) calendar days after receipt of the response to the City Manager or designee.

Within fifteen (15) calendar days after receipt of the appeal, the City Manager or designee will meet with the complainant to discuss the complaint and possible resolutions. Within fifteen (15) calendar days after the meeting, the City Manager or designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA Coordinator or designee, appeals to the City Manager or designee, and responses from these offices will be retained by the City of Cherry Hills Village for at least three (3) years.