DIGITAL ACCESSIBILITY TRANSITION PLAN

Transitioning to WCAG 2.1 (AA) Compliance by July 2024

Introduction and Overview:

The city of Aspen is committed to ensuring its digital information technology and online services are accessible to the widest possible audience, regardless of technology or ability. In furtherance of this goal, the City of Aspen has developed a Digital Accessibility Transition Plan to actively work on increasing the accessibility and usability of our online services and information technology.

In 2021, the State of Colorado enacted House Bill 21-1110 to address accessibility standards for state and local government websites. Compliance with this law is required by July 1, 2024. In addition, the Colorado Governor's Office of Information Technology adopted Rules Establishing Technology Accessibility Standards on February 23, 2024. The city of Aspen's intent is to meet or exceed the standards set forth in these guiding documents.

The purpose of the plan is to document the city of Aspen's long-term strategic approach to improving the internal and external accessibility of its information and communication technology, websites, online services, and digital materials in compliance with Colorado laws and regulations. Herein, the city of Aspen will summarize its transition plan, and ongoing management plan that:

*Provides an overview of the State of Colorado online accessibility requirements.

* Identifies customer-facing applications and portable document types that may create barriers to online accessibility.

* An overview of the City's Online Accessibility Policy.

* Testing and Prioritization Methods.

*Methods for timely responding to reports of inaccessibility and requests for accommodation.

Because technology is constantly improving, expanding, and increasing in scope, ensuring accessibility requires continuous attention. As such, the Digital Accessibility Transition Plan will

be reviewed and revised quarterly to reflect the assessment and measurement of progress toward meeting our broad accessibility goals.

Colorado Accessibility Requirements

In June of 2021, the Colorado Laws for Persons with Disabilities Act (HB21-1110) was signed. This act strengthened protections under the Colorado Anti-discrimination Act (CADA) for individuals with disabilities, specifically as it relates to accessibility of government information technology. The additional 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, on or before July 1, 2024, with accessibility guidelines established by the Governor's 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."

City of Aspen Technology Accessibility Statement:

The City of Aspen is committed to ensuring that its online services and information and communication technologies are accessible to all individuals, regardless of their abilities or disabilities, and will, to the extent it is reasonably possible, provide digital content that reasonably enables a person with a disability to access the same information, engage in the same interactions, and enjoy the same services offered to other individuals, with the same privacy, independence, and ease of use as exists for individuals without disability.

The City of Aspen likewise will provide timely responses to reports of inaccessibility and requests for reasonable accommodation or modification for the purpose of accessing information and communication technology.

Reports of inaccessibility and requests for reasonable accommodation can be made to the city through any of the following:

Via regular mail:

Aspen City Hall
427 Rio Grande Place
Aspen, CO 81611

Via email:

ADACompliance@aspen.gov

Via telephone:

970-920-5079 (available Monday-Friday between the hours of 8:00 a.m. - 5:00 p.m. Mountain time excluding observed City holidays)

Via Relay Colorado (Deaf and Hearing-Impaired Individuals)

Call 7-1-1

Via online form

The City of Aspen will respond within fourteen (14) days of receipt of a report of inaccessibility or request for accommodation or modification.

The City of Aspen Technology Accessibility Statement will be publicly posted at City Hall in a conspicuous place and will also be posted on aspen.gov.

In furtherance of its commitments stated herein, the City of Aspen Digital Accessibility Transition Plan was developed to promote access to information, services, programs, and activities provided by the City online and through other digital platforms to persons with disabilities in a manner that does not substantially hinder, with reasonable accommodation or modification if needed, persons with disabilities from accessing or engaging effectively in the same or substantially equivalent services, programs, and activities as those without disabilities and with the same ease of use. This policy shall apply to all information and communication technologies, including City customer facing websites, City internal websites, mobile applications, digital kiosks, digital documents such as portable document format (PDF), digital images, and video and audio resources.

Scope:

The City's Digital Accessibility Transition Plan applies to all web-based services and digital information and communications technologies utilized by the city, internally and externally, including, but not limited to:

- The City of Aspen website, aspen.gov, including all subdomains of the aspen.gov domain, and webforms hosted on any aspen.gov subdomains. For purposes of this plan, a City of Aspen website shall include other websites provided by a City department such as Aspen Recreation Center, Wheeler Opera House, Aspen Golf, Aspen Special Events, and Red Brick Center for the Arts. This also includes the Aspen/Pitkin County Housing Authority website.
- Third-party vendor sites offered or procured by the City of Aspen for the purpose of providing services or information.

- All mobile applications are used by the city to provide information or services.
- All content posted on city of Aspen social media channels.
- All online forms, documents, surveys, etc., created or kept in digital format and maintained by the City of Aspen.
- All service departments' kiosks, applications, etc., used to provide services.
- Digital materials maintained by the city, including images, video, and audio materials.

This plan does not apply to unauthorized web pages or digital communications published by employees, which are not used to conduct city business.

Accessibility Standards

The City of Aspen is committed to assuring individuals with disabilities are not hindered, with reasonable accommodations or modifications if needed, from accessing or engaging effectively in the same or substantially equivalent services, programs, and activities that the City offers through information and communication technology to those without disabilities, with substantially equivalent ease of use.

Web Content Accessibility Standards.

Pursuant to the standards required under HB 21-2111, the City of Aspen uses the most recently adopted version of the Web Content Accessibility Guidelines (WCAG) 2.1 level AA as a guideline for accessibility of digital content. WCAG is developed by W3C, an organization that maintains standards for creating content on the internet. W3C develops WCAG standards in cooperation with individuals and organizations around the world, with a goal of providing a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally. The WCAG principles and guidelines explain how to make web content more accessible to people with disabilities. WCAG is thorough but does not cover every circumstance.

Our ongoing accessibility effort works toward being in line with the Web Content Accessibility Guidelines (WCAG) version 2.1, level AA criteria. These guidelines not only help make technology accessible to users with sensory, cognitive and mobility disabilities, but ultimately to all users, regardless of ability.

Our efforts are just part of a meaningful change in making all City of Aspen services inclusive and accessible with a goal to deliver a web experience that achieves Level AA conformance according to the Web Content Guidelines Accessibility (WCAG 2.1).

Accessibility Tools:

To work towards compliance with WCAG 2.1, Level AA Guidelines, the city of Aspen has used the following testing tools and technologies to identify barriers to accessibility and improve digital services. The following tools are not intended to represent an inclusive list, but a shortlist of tools and processes the City will rely upon in its compliance initiatives.

AudioEye

AudioEye is an accessibility plug-in. AudioEye generates continually updated reports of found accessibility barriers and will attempt to fix the issues. It can also provide automated remediations. The AudioEye plug-in also provides a user toolbar that enables website visitors to customize their view and experience with the website to make it more accessible for them. AudioEye has been installed on most of the websites associated with the City.

Accessibility Check Tools

Outlook, Microsoft Word, and Adobe are all programs regularly used by staff that incorporate accessibility compliance tools in the software. Staff shall utilize these tools when creating documents.

Organizational Measures:

Since 2020, the city has taken many steps to achieve compliance with WCAG 2.1 Level AA guidelines.

- 2021- City staff established the Web Matrix Team. The Web Matrix Team is responsible for the Aspen.gov website design refresh to update the City's websites to meet WCAG 2.1 Level AA Compliance.
- 2022- City staff created project scope for digital accessibility and began drafting this plan.
- January – March 2023: Project manager worked with Civic Plus consulting services to restructure permission levels for aspen.gov to ensure that only trained editors are able to add content. Trained editors are defined as those who have received the required accessibility trainings.
- March 2023- The Web Publishers team was formed. The Web Publishers team consists of 2-3 members from each city department responsible for updating and managing department web pages.
- May 2023 –The city project manager and web publishers team began review of the city's web content on aspen.gov to assess accessibility barriers and areas of non-compliance with WCAG 2.1 Level AA. City departments began the content clean-up process.
- June 2023-The city began to draft accessibility statements for purposes of procurement of information and communication technology applicable to its contract with website creators, third party vendors, and for use in its RFP processes.
- July 2023- The city project manager, web publishers, and web matrix team began updating written content, links, documents, images, FAQs, forms, videos, and contact information to address accessibility issues.
- August 2023- City departments finalized all aspen.gov content updates.
- September 2023-The city launched a new web design for aspen.gov with Civic Plus.
- October and November 2023: The web publishers team began to update links and information in aspen.gov mega menu.

- December 2023: The web publisher's team and project manager updated aspen.gov mega menu and permitting pages. The Aspen Parks and Open Space team contracted a web developer to begin remediating web content on aspenparks.com. Civic Plus Consultant completed 4 hours of SEO work on aspen.gov.
- January 2024: Web consultant began to migrate content from aspen.gov to aspenparks.com to create consistent information located on one web service.
- February 2024: Web consultant completed updates to aspenparks.com

April 2024: Staff members attended training held with the Rocky Mountain ADA over two days, including an overview of how to create accessible documents.

Milestones:

Review, Remediate, and Refresh Current Content on Aspen.gov and other city websites

The city will employ accessibility standards audits of all websites, and in a similar manner will audit the production of updated content. If inaccessible content is identified during the audit process, the city will develop a strategic remediation plan to address all inaccessible content.

Goal: Review and remediate current content on aspen.gov and other city websites and information and communication technology. For website content, each department will review and update all written content, update, and fix all broken links, update photos, graphics, and infographics with alternative text, remove all outdated content and documents, include file extensions in document file names. In conjunction with department work, a re-design for aspen.gov that follows WCAG 2.1 Level AA guidelines will launch. Review and remediation of all department web pages was completed by December 2023. Vendor contracts will be reviewed for compliance, and procurement of third-party services will require compliance.

Status: In progress. As of July 2024, the city of Aspen departments have taken the following action to review and remediate their online content:

- Environmental Health and Sustainability: Updated all written content, removed web pages with outdated content, updated all documents and included file extensions, added alternative text to all images and graphics, updated all contact information, updated Environment Mega Menu links to fix all broken links.
- Utilities Department: Updated all written content, removed web pages with outdated content, updated all documents and included file extensions, added alternative text to all images and graphics, updated all contact information, updated permitting pages and forms, updated all links on aspen.gov homepage, and doing business mega menu tab.
- Parks and Recreation Department: Moved all content to aspenrec.com to streamline information and location of information, worked with consultant to migrate information to aspenrec.com, updated all written content on aspenrec.com, updated all links on aspen.gov to link to correct place on aspenrec.com.

- Community Development Department: Updated all written content, removed web pages with outdated content, updated all documents and included file extensions, added alternative text to all images and graphics, updated all contact information, updated permitting pages and forms, updated all links on aspen.gov homepage, and doing business mega menu tab, created public facing resource library.
- Transportation Department: Updated all written content, updated all links to documents, other web pages, included file extensions in document naming, updated all contact information, updated all documents to include file extensions, Added alternative text to all images and infographics.
- Human Resources Department: Updated all written content, updated all links to documents, other web pages, included file extensions in document naming, updated all contact information, updated all documents to include file extensions, Added alternative text to all images and infographics.
- City Manager's Office: Updated all written content, updated all links to documents, other web pages, included file extensions in document naming, updated all contact information, updated all documents to include file extensions, added alternative text to all images and infographics.
- Clerks Department: Updated all written content, updated all links to documents, other web pages, included file extensions in document naming, updated all contact information, updated all documents to include file extensions, added alternative text to all images and infographics, Updated licensing pages and forms.
- Engineering Department: Updated all written content, updated all links to documents, other web pages, included file extensions in document naming, updated all contact information, updated all documents to include file extensions, added alternative text to all images and infographics, worked with GIS vendor to update all GIS maps on aspen.gov to meet WCAG 2.1 Standards, updated all permitting pages, links, forms. The Map Aspen hub is being redesigned; the redesign is anticipated to be completed by August 2024.
- Civic Plus consultant completed 4 hours of work to add keywords to web pages on aspen.gov. Improved search engine optimization to increase the searchability of programs and services on aspen.gov.
- AspenRecreation.com: An outside web consultant performed a full accessibility audit using a combination of automated and manual testing methods along with testing by three different disabled users. The information from those audits & tests are being used to make edits to the existing site code to make the main navigation fully accessible as well as improve the accessibility of the event calendar, activity pages, and notifications used across the website. Site-wide issues to improve contrast and address heading order errors are being remediated. Audioeye has been applied to this site, along with a google translate feature. For more information, refer to Appendix A.

- Wheeler Opera House: Launched new website in April 2023. Staff worked closely with the vendor to ensure the website met or exceeded WCAG 2.1 Level AA guidelines.
- AspenGolf.com: An outside web consultant performed a full accessibility audit using a combination of automated and manual testing methods. This information will be used to resolve contrast errors, adjust the format of content on the website in areas that are currently not fully accessible, reduce the use of motion, and will also be sending Squarespace (the hosting/platform provider for the website) a list of accessibility issues the audit found that are inherent within the source code of their SaaS platform. If Squarespace is not able/willing to make the changes to the source code, other options will be explored to resolve the issues using custom scripts. Audioeye has been applied to this site, along with a google translate feature. For more information, refer to Appendix B.
- RedBrickAspen.com: An outside web consultant is working on a re-design and is in the planning stages of migrating the website to Squarespace v7.1 with the goal of making a friendlier, easier to use website for people of all abilities. Improvements to the navigation, contrast, and readability of content along with reducing the use of motion in the site. Any of the custom scripts developed for use on the Golf website can also be applied to this website since they will be utilizing the same platform and version. Once the site is migrated, an audit will be completed, and remediation will occur. Audioeye has been applied to this site, along with a google translate feature. For more information, refer to Appendix C.
- AspenSpecialEvents.com: An outside web consultant is being used to migrate the website to Squarespace v7.1 with the goal of making a friendlier, easier to use website for people of all abilities. Improvements to the navigation, contrast, and readability of content with the main goal of making it easier for visitors to find relevant information for events held within the City of Aspen will occur. As with the Red Brick site, any of the custom scripts developed for use on the Golf or Red Brick websites can also be applied to this website since they will be utilizing the same platform and version. Once the site is migrated, an audit will occur, and remediation will take place. Audioeye has been applied to this site, along with a google translate feature. For more information, refer to Appendix D.
- APCHA.org - APCHA has plans to undergo a website refresh and will be using the opportunity to make accessibility updates as well. AudioEye has been installed to the website. Identification of Information Communication Technology Used by the city:

Goal: The city will identify non-accessible information and communication technology and develop plans that prioritize compliance for those most used by the public.

Status: As of the end of June 2024, each department has completed a questionnaire identifying information and communication technology used by the department, and compliance with accessibility standards. This is specific to information on websites and the way in which

websites function, videos and audio that are available on city websites or as content on other platforms such as social media, third-party vendors including those that are accessible through the city's websites.

If any department has information and communication technology that is not compliant the department will:

> 1. Identify the technology

> 2. Develop a plan to gain compliance if possible. Such a plan must include a timeline for compliance.

> 3. Identify a staff member who can assist with reasonable accommodation and modification requests to access the technology.

> 3. Update the plan for compliance regularly.

Document Review and Remediation

As of this publication, the city received two responses to an RFP for document remediation for an initial list of documents (aspen.gov documents) that ranged from $146,753.57 to $67,335 based on bulk and vendor. This is currently an unbudgeted expense. City staff are reviewing documents on the website and removing those that are already archived or are no longer useful to the public. Original documents will be retained per the retention schedule.

Goal: To remediate documents that are in use on the website and to remove others that are not needed.

Status: In progress. Evaluation of documents on websites for frequency of use and significance is ongoing. A first phase of remediation for those priority documents is expected to take a year, starting in mid-2024. New documents that are added to the websites will be made accessible from the outset. Training for employees about how to create accessible documents took place in the spring of 2024. When new documents are added to the website, including PDFs, they will be made accessible. Individual requests for existing PDFs to be made accessible by sending an email to adacompliance@aspen.gov.

Technology Services Vendor Agreements entered into prior to July 1, 2024

In order to ensure the city of Aspen is providing accessible services through third party vendors, the core accessibility team has sent letters, approved by legal, to as many

existing third-party digital vendors as possible to assess whether their platform is compliant with the WCAG 2.1 Level AA guidelines. For those third-party vendors whose services meet WCAG 2.1 Levell AA guidelines, proof of audit or written confirmation to be provided to the City. If a third-party vendor is not capable of meeting WCAG 2.1 Level AA guidelines the third-party vendor shall be asked to provide a timeline for compliance, and if there is no timeline for compliance, the City will evaluate if options exist to obtain compliance with another vendor.

Goal: Written verification to be received by third-party vendors on or before June 15, 2024. If non-compliant, the goal is to achieve compliance if the city desires to continue to the use the product.

Status: This is in progress and being tracked through the software Torii.

The prioritization of high visibility vendors providing services and checking to see if they are compliant will take place in 2024. Staff are also reviewing contracts that automatically renew to ensure compliance moving forward. Phase 2 will start in 2025 to test vendors to ensure compliance. The testing software or tool has not yet been identified.

Accessibility Training

Accessibility training is important to help staff understand accessibility and ensure it becomes common practice. As staff develops a greater awareness and understanding of accessible implementations, the time and expense spent on evaluation and rework will decrease.

Goal: Train all staff members who are Web publishers and/or create public facing documents regularly. Training these staff members will improve general accessibility knowledge and ways to use best practices, and more specifically improve document accessibility and website accessibility.

Status: Rocky Mountain ADA provided training to 55 staff members in April 2024. These staff members represented department directors and web publishers for all 23 city departments. The staff members were trained on overview principles for digital accessibility, how to create accessible documents, and how to create accessible social media.

The city of Aspen accessibility team will bring back the trainings by Rocky Mountain ADA to provide training to more staff members in Fall 2024.

Procurement of Accessible Technology

The legal and finance department has been working closely to update all professional service agreements, future contract language, and RFP language for third-party vendors creating or providing information and communication technologies, and online services. IT Department has a checklist for procurement of all software, and as part of that

checklist the vendor must confirm compliance with WCAG 2.1 Level AA standards and provide an audit evidencing compliance.

Goal: The city of Aspen shall procure digital and online services that meet WCAG 2.1 Level AA accessibility standards to ensure that all users, including those with disabilities, have equal access to information and services provided by the City.

Status: This has been completed for new vendors and new contracts. This will be an ongoing effort as new procurement processes take place and contracts are renewed. Quarterly

Maintenance

Digital accessibility is an ongoing effort. The city will maintain accessibility for all web and digital content. As digital accessibility standards update, the city will do its best to ensure those standards are met. In accordance with House Bill 24-1454, the city will update this document quarterly to demonstrate good faith efforts to comply with Colorado's digital accessibility standards.

Additional Resources:

W3C Accessibility Principles

The W3C WAI is largely considered the international authority for web accessibility. As such, they have developed the POUR principles for accessibility that provides guidelines for creating web content and websites that are **perceivable**, **operable**, **understandable**, and **robust**.

- **Perceivable:** Information and user interface components must be presentable to users in ways they can perceive. This includes providing text alternatives for non-text content, providing captions and other alternatives for multimedia, enabling content to be presented in different ways, and ensuring content is easier to see and hear.
- **Operable:** User interface components and navigation must be operable. This involves ensuring that website functionality is available from a keyboard, users have enough time to read and use content, web content does not cause seizures and physical reactions, user can easily navigate, find content, and determine where they are, and user can utilize different input modalities beyond keyboard.
- **Understandable:** Information and the operation of the user interface must be understandable. This involves ensuring that text is readable and understandable, content appears and operates in predictable ways, and content is provided in a way that helps users avoid and correct mistakes.
- **Robust:** Content must be robust enough that it can be interpreted reliably by a wide variety of users and user agents, including assistive technologies. This guideline focuses on creating content that is compatible with current and future user tools.

Glossary

- *Accessible or Accessibility:* The meaning of this term shall be the same as defined in section 24-85-102(1.5), C.R.S., or as amended from time to time, which is perceivable, operable and understandable digital content that reasonably enables an individual with a disability to access the same information, engage in the same interactions, and enjoy the same services offered to other individuals, with the same privacy, independence, and ease of use as exists for individuals without a disability.   An accessible web page is one that can be used effectively by a person with a disability in the same capacity as a person without a disability. The industry standard guidelines for web content accessibility are organized around four principles: Perceivable, Operable, Understandable, and Robust (or POUR).
- *Assistive technology*: The hardware and software people with disabilities use to interact with the web
- *Compliance:* Compliance is satisfied when web content meets with the Web Content Accessibility Guidelines 2.1 (WCAG)-Level A and AA.
- *Content Managers:* A content manager is an individual who manages or contributes content to the City website, including text, documents, images, video, audio and other information
- *Departmental Implementation/Support:* All web administrators and city staff play an important role in Aspen's success to ensure the goals of Web Accessibility Plan are met in a timely manner. Each department contributes by implementing accessibility best practices or supporting other departments as they train, assess, remediate, and create accessible Web content.
- *Disability:* Definitions for the term disability vary widely, arising from medical or social perspectives. Commonly accepted disabilities include (but are not limited to) impairment of one or more senses, cognitive disabilities, and mobility limitations.
- *Document accessibility:* Word processing documents, spreadsheets, PDFs, presentations and publications, which are scanned, uploaded or posted to the City website that allow persons with disabilities to access the content contained within.
- *Operable:* A user can successfully use controls, buttons, navigation, and other necessary interactive elements
- *Perceivable:* The user can identify content and interface elements by means of the senses. For many users, this means perceiving a system primarily visually, while for others, perceivability may be a matter of sound or touch.
- *POUR:* Perceivable, Operable, Understandable, Robust
- *Remediation:* When a website is found to be out of compliance with accessibility standards, a process of "remediation" is undertaken to either retrofit, redesign, or remove the website.

- *Robust:* Technology is standards-compliant and designed to function on all appropriate technologies. Users should be able to choose the technology they use to interact with websites, online documents, multimedia, and other information formats.
- *Screen Reader:* A software application that attempts to identify and interpret what is displayed on the screen, translating the information usually to speech. Screen readers are relied on by people with no functional vision, but software that reads out on-screen content may also be used by people who have difficulty reading, because of a visual or cognitive impairment.
- *Software and Apps:* Software and apps refers to a computer program, or group of programs, that users interact with designed to carry out operations in support of a business function
- *Standards:* A standard is a set of requirements, specifications, characteristics, or guidelines that can be used to measure products, processes, and services. A standard can provide an incentive for compliance, and may be required by a customer, even though there is no legal requirement for adhering to them.
- *Understandable:* Technology is consistent in its presentation and format, predictable in its design and usage patterns, concise, multimodal, and appropriate to the audience in its voice and tone.
- *Usability:* Refers to how easily, effectively, and efficiently people, including people with disabilities, can use a product or system to achieve their goals, and how satisfied they are with the experience. The definition can be extended to **user experience**, covering a more subjective quality of enjoyment.
- *Voice Recognition:* A software application that enables a computer to accept voice commands. This allows for little or no use of the keyboard and mouse.
- *WCAG 2.1AA:* WCAG 2.1 is a stable, referenceable technical standard. It has 12 guidelines that are organized under the POUR principles. For each guideline, there are testable success criteria, which are at three levels: A, AA, and AAA.
- *W3C:* The World Wide Web Consortium. W3C develops international standards for the Web: HTML, CSS, and more!
- *W3C WIA:* The World Wide Web (W3C) Web Accessibility Initiative (WAI) develops standards and support materials to help individuals and organizations understand and implement accessibility.
- *Web Accessibility:* Web accessibility means that a person with a disability can perceive, understand, navigate, interact with, and contribute to web content with the same effectiveness as a person without a disability. Accessible information systems are developed to be flexible enough to accommodate the needs of the broadest range of users, regardless of age or disability.
- *Web Content and Services:* All information, content or visual/auditory media hosted or displayed directly through the City's website or related systems.

Appendix A - Accessibility Statement and Progress Report for AspenRecreation.com

Accessibility Conformance Status

Aspen Recreation is committed to accessibility and strives to ensure its services are accessible to the broadest circle of people, including those with disabilities. We are currently working to make this website conform to the principles of the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG 2.2) Level AA.

Technical Specifications

The accessibility of Aspen Recreation relies on the following technologies:

- HTML
- WAI-ARIA
- CSS
- JavaScript

Accessibility Features

Aspen Recreation reaches beyond compliance, providing usability improvements that benefit all users, including those that rely on assistive technology. Accessibility features on our website include, but are not limited to:

- Keyboard accessibility
- Sufficient color contrast
- Alternative text
- Form labels
- Video captions
- Text-zoom

Accessibility Evaluation

This website is continuously tested with a robust accessibility program using both manual and automated testing techniques. To help ensure that all people have the same experience on our website, it has also been tested and reviewed by disabled individuals using various assistive technologies. Additionally, we have commissioned third-party accessibility auditors at Be Accessible Inc. to confirm accessibility and provide guidance with accessibility remediation.

To identify priorities for content remediation and encourage new content to meet requirements, the City has also implemented the AudioEye reporting program on this website. In addition to providing accessibility tools to front-end users, AudioEye includes a monthly report of issues fixed by the AudioEye software and identifies issues that must be fixed at the source or require custom code to fix. Where possible, we use these reports to identify content that needs remediation and to help develop custom code to enhance accessibility.

Technology is constantly evolving, and new techniques to implement web accessibility are increasingly available. We will continue to review our website and apply additional accessibility remediations as needed.

Statement on Current Limitations

Some pages may contain images lacking useful alt-text. In most cases, those images are decorative, so no information has been lost. Similarly, some PDFs or other documents linked to on this site may have accessibility issues. Because of the large amount of content on this website, it has not been possible to fully review every image, document, and page. Due to funding and staffing limitations, remediating all digital content before the July 2024 deadline would cause an undue burden to the City of Aspen's Recreation department. By prioritizing content and providing paths for content to be requested in alternative formats, we ensure equal access to our programs and services. Please contact us if you encounter inaccessible content or files.

Progress to Date

As of July 1, 2024, the following steps have been taken to make this website more accessible:

1. **Automated Accessibility Review**
   - Implemented automated tools to scan and identify accessibility issues across our website.
2. **Manual Accessibility Review & Third-Party Audit**
   - Conducted manual reviews of the website to ensure compliance with the WCAG 2.2 AA accessibility standard and partnered with Be Accessible Inc. for an independent audit of our website.
3. **Review by Disabled Individuals**
   - Worked with disabled individuals who use assistive technologies to perform usability testing.
4. **Remediation of Identified Issues**
   - Improved keyboard navigation and focus indicators across all pages.
   - Enhanced color contrast ratios to meet accessibility standards.

- o Began reviewing and removing old images and adding alternative text for images to support screen readers.
- o Ensured all form fields have proper labels.
- o Revised website code to use semantic elements to help screen readers and other assistive technologies better understand content.
- o Updated code to better reflect logical reading order.
- o Added aria labels where needed for better labeling of links, forms, and other interactive content.
- o Updated links to better reflect their purpose and content.
- o Reviewed digital documents and began removing old, outdated documents from the website.
- o Reviewed video content and began the process of updating captions and transcripts.

5. **Staff Training and Document Review**
   - o Staff have been trained in creating accessible web content.
   - o Staff have been trained in how to create accessible digital documents.

Future Plans

Aspen Recreation is committed to continuing its efforts to enhance website accessibility. Future plans include:

- **Summer 2024**
  - o Update core code frameworks on the AspenRecreation.com website to the most recent versions and apply additional code improvements to the website to further enhance accessibility.
  - o Complete review of digital documents and begin remediation of important documents.
- **Fall 2024**
  - o Audit current marketing and informational email templates and begin remediating any discovered and correctable accessibility issues.
  - o Continue remediation of digital documents and move to second-tier documents.
  - o Continue review and corrections to image descriptions.
- **By July 1, 2025**
  - o Complete accessibility remediation for all digital documents.
  - o Complete review and updates to image descriptions across the entire website to ensure they are as informative as possible.
  - o Thorough review of all website text content and links for conformance to current accessibility standards.

In addition to these steps, we will continue to monitor, review, and improve our website's accessibility features. By taking these steps, Aspen Recreation is committed to ensuring a more accessible and inclusive online experience for all users.

Appendix B - Accessibility Statement and Progress Report for AspenGolf.com

Accessibility Conformance Status

The Aspen Golf Club is committed to accessibility and strives to ensure its services are accessible to the broadest circle of people, including those with disabilities. We are currently working to make this website conform to the principles of the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG 2.2) Level AA.

Technical Specifications

The accessibility of The Aspen Golf Club relies on the following technologies:

- HTML
- WAI-ARIA
- CSS
- JavaScript

Accessibility Features

The Aspen Golf Club reaches beyond compliance, providing usability improvements that benefit all users, including those that rely on assistive technology. Accessibility features on our website include, but are not limited to:

- Keyboard accessibility
- Sufficient color contrast
- Alternative text
- Form labels
- Video captions
- Text-zoom

Accessibility Evaluation

This website is continuously tested with a robust accessibility program using both manual and automated testing techniques. To help ensure that all people have the same experience on our website, it has also been tested and reviewed by disabled individuals using various assistive technologies. Additionally, we have commissioned third-party accessibility auditors at Be Accessible Inc. to confirm accessibility and provide guidance with accessibility remediation.

To identify priorities for content remediation and encourage new content to meet requirements, the City has also implemented the AudioEye reporting program on this website. In addition to providing accessibility tools to front-end users, AudioEye includes a monthly report of issues fixed by the AudioEye software and identifies issues that must be fixed at the source or require custom code to fix. Where possible, we use these reports to identify content that needs remediation and to help develop custom code to enhance accessibility.

Technology is constantly evolving, and new techniques to implement web accessibility are increasingly available. We will continue to review our website and apply additional accessibility remediations as needed.

Statement on Current Limitations

Some pages may contain images lacking useful alt-text. In most cases, those images are decorative, so no information has been lost. Similarly, some PDFs or other documents linked to on this site may have accessibility issues. Because of the large amount of content on this website, it has not been possible to fully review every image, document, and page. Due to funding and staffing limitations, remediating all digital content before the July 2024 deadline would cause an undue burden to the Aspen Golf Club. By prioritizing content and providing paths for content to be requested in alternative formats, we ensure equal access to our programs and services. Please contact us if you encounter inaccessible content or files.

Progress to Date

As of July 1, 2024, the following steps have been taken to make this website more accessible:

6. **Automated Accessibility Review**
   o Implemented automated tools to scan and identify accessibility issues across our website.
7. **Manual Accessibility Review & Third-Party Audit**
   o Conducted manual reviews of the website to ensure compliance with the WCAG 2.2 AA accessibility standard and partnered with Be Accessible Inc. for an independent audit of our website.
8. **Review by Disabled Individuals**
   o Worked with disabled individuals who use assistive technologies to perform usability testing.
9. **Remediation of Identified Issues**
   o Improved keyboard navigation and focus indicators across all pages, especially within the main navigation.
   o Enhanced color contrast ratios.

- o Began the process of reviewing the following types of content within the website's content management system (CMS) and replacing/updating affected content to make it accessible:
    1. Removed old images and added alternative text for images to support screen readers.
    2. Removed inaccessible components and replaced them with accessible versions.
    3. Reviewed individual page layouts for color contrast, heading order, and logical reading order of content.
    4. Updated links to better reflect their purpose and content.
  - o Reviewed digital documents and began removing outdated documents from the website.
  - o Reviewed video content and began the process of updating captions and transcripts.
10. **Staff Training and Document Review**
  - o Staff have been trained in creating accessible web content.
  - o Staff have been trained in how to create accessible digital documents.

Future Plans

The Aspen Golf Club is committed to continuing its efforts to enhance website accessibility. Future plans include:

- **Summer 2024**
  - o Continue reviewing and remediating website content.
  - o Identify and delete outdated documents and images.
  - o Identify priority documents for remediation.
- **Fall 2024**
  - o Review the use of third-party software for accessibility after the closing of the current golf season.
  - o Audit current marketing and informational email templates and begin remediating any discovered and correctable accessibility issues.
  - o Continue remediating digital documents and move to second-tier documents.
  - o Finish reviewing and remediating website content.
- **By July 1, 2025**
  - o Complete accessibility remediation for all digital documents.
  - o Complete review and updates to image descriptions across the entire website to ensure they are as informative as possible.

- o Before the next golf season, thoroughly review all website text content and links for conformance to current accessibility standards.

In addition to these steps, we will continue to monitor, review, and improve our website's accessibility features. By taking these steps, The Aspen Golf Club is committed to ensuring a more accessible and inclusive online experience for all users.

Appendix C - Accessibility Statement and Progress Report for RedBrickAspen.com

Accessibility Conformance Status

The Red Brick Center for the Arts is committed to accessibility and strives to ensure its services are accessible to the broadest circle of people, including those with disabilities. We are currently working to make this website conform to the principles of the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG 2.2) Level AA.

Accessibility Evaluation

To identify priorities for content remediation and encourage new content to meet requirements, the City has implemented the AudioEye reporting program on this website. In addition to providing accessibility tools and automated improvements to front-end users, AudioEye includes a monthly report of issues fixed by the AudioEye software and identifies issues that must be fixed at the source or require custom code to fix. Where possible, we use these reports to identify content that needs remediation and to help develop custom code to enhance accessibility.

Technology is constantly evolving, and new techniques to implement web accessibility are increasingly available. We will continue to review our website and apply additional accessibility remediations as needed.

Statement on Current Limitations

Some pages may contain images lacking useful alt-text. In many cases, those images are decorative, so no information has been lost. Similarly, some PDFs or other documents linked to on this site may have accessibility issues. Because of the large amount of content on this website, it has not been possible to fully review every image, document, and page. Due to funding and staffing limitations, remediating all digital content before the July 2024 deadline would cause an undue burden to the Red Brick Center for the Arts. By prioritizing content and providing paths for content to be requested in alternative formats, we ensure equal access to our programs and services. Please contact us if you encounter inaccessible content or files.

Progress to Date

As of July 1, 2024, the following steps have been taken to make this website more accessible:

11. **Automated Accessibility Review**

o   Implemented automated tools to scan and identify accessibility issues across our website.

12. **Manual Accessibility Review**

o   A manual review of the current website resulted in the decision that in order to best serve the general public and provide content that is accessible to all, a new website would need to be built.

13. **Began the Process of Creating a New Website**

o   Migrated existing content to a more accessible software platform.

o   Reviewed and deleted old, unnecessary content.

o   Revised the color scheme and logo to meet accessibility standards.

Future Plans

The Red Brick Center for the Arts is committed to continuing its efforts to enhance website accessibility. Future plans include:

- **Summer 2024**
  - o   Finish review of old website content & media.
  - o   Finalize website theme in accordance with WCAG 2.2 AA guidelines.
  - o   Begin manual review of individual pages to provide updated information, cleaner layout/design, and correct for accessibility issues.
- **Fall 2024**
  - o   Finish manual review of and updates to individual pages.
  - o   Launch new website.
  - o   Audit current marketing and informational email templates and begin remediating any discovered and correctable accessibility issues.
  - o   Complete review of digital documents and begin remediation of important documents.
- **By July 1, 2025**
  - o   Complete accessibility remediation for all remaining digital documents.
  - o   Complete review and updates to image descriptions across the entire website to ensure they are as informative as possible.
  - o   Perform third-party audit of the website including a review by disabled individuals.

In addition to these steps, we will continue to monitor, review, and improve our website's accessibility features. By taking these steps, The Red Brick Center for the Arts is committed to ensuring a more accessible and inclusive online experience for all users.

Appendix D - Accessibility Statement and Progress Report for AspenSpecialEvents.com

Accessibility Conformance Status

Aspen Special Events is committed to accessibility and strives to ensure its services are accessible to the broadest circle of people, including those with disabilities. We are currently working to make this website conform to the principles of the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG 2.2) Level AA.

Accessibility Evaluation

To identify priorities for content remediation and encourage new content to meet requirements, the City has implemented the AudioEye reporting program on this website. In addition to providing accessibility tools and automated improvements to front-end users, AudioEye includes a monthly report of issues fixed by the AudioEye software and identifies issues that must be fixed at the source or require custom code to fix. Where possible, we use these reports to identify content that needs remediation and to help develop custom code to enhance accessibility.

Technology is constantly evolving, and new techniques to implement web accessibility are increasingly available. We will continue to review our website and apply additional accessibility remediations as needed.

Statement on Current Limitations

Some pages may contain images lacking useful alt-text. In many cases, those images are decorative, so no information has been lost. Similarly, some PDFs or other documents linked to on this site may have accessibility issues. Because of the large amount of content on this website, it has not been possible to fully review every image, document, and page. Due to funding and staffing limitations, remediating all digital content before the July 2024 deadline would cause an undue burden to Aspen Special Events. By prioritizing content and providing paths for content to be requested in alternative formats, we ensure equal access to our programs and services. Please contact us if you encounter inaccessible content or files.

Progress to Date

As of July 1, 2024, the following steps have been taken to make this website more accessible:

14. **Automated Accessibility Review**

- Implemented automated tools to scan and identify accessibility issues across our website.

15. **Manual Accessibility Review**
    - A manual review of the current website resulted in the decision that in order to best serve the general public and provide content that is accessible to all, a new website would need to be built.

16. **Began the Process of Creating a New Website**
    - Migrated existing content to a more accessible software platform.
    - Reviewed and deleted old, unnecessary content.
    - Revised the color scheme to meet accessibility standards.

Future Plans

Aspen Special Events is committed to continuing its efforts to enhance website accessibility. Future plans include:

- **Summer 2024**
  - Finalize website theme in accordance with WCAG 2.2 AA guidelines.
  - Begin manual review of individual pages to provide updated information, cleaner layout/design, and correct for accessibility issues.
- **Fall 2024**
  - Finish manual review of and updates to individual pages.
  - Review and remediate any existing documents.
  - Launch new website.
- **By July 1, 2025**
  - Perform a full manual audit of the website and complete remediation of any remaining accessibility issues.

In addition to these steps, we will continue to monitor, review, and improve our website's accessibility features. By taking these steps, Aspen Special Events is committed to ensuring a more accessible and inclusive online experience for all users.

Appendix E – Quarterly Updates

July-Oct. 1, 2024, Quarterly Update

Finance Department Overview: The department has been working towards accessibility in its online financial publications and web-based tools used for internal processes. They have procured new web tools to generate their annual budget and annual audited financials. The

department has been implementing these solutions to create new material going forward. External website usage has also been implemented to enhance ADA accessibility.

Budget: The ClearGov platform is being implemented as the City's Budget and planning solution. This platform includes a digital budget book product specifically designed to be ADA-compliant. The 2025 budget book is currently being built with digital-compliant formatting. New modules on capital planning and budget books are now being implemented into the City's system, and they plan to add additional modules from their platform in the upcoming months. On 9/6/2024 ClearGov assembled their digital budget book v2.0, with even more features. The Budget team will continue internal training and onboarding for staff of the new product in 2025.

Procurement: BidNet contracting has been approved for use as the City's requisition management and digital contract solution. This is an internal solution instead of what is in place now which is external. BidNet is a compliant software solution that is currently used for issuing RFP and RFQ's. On 9/5/2024, Procurement began the development of a timeline and will be implementing this in quarter one of 2025.

Accounting: The accounting system will implement audited consolidated financial reports through the ClearGov platform starting in December 2024.

Strategy and Innovation: The Strategy and Innovation team along with the IT Department have been tracking vendors for the City of Aspen in the new software tool Torii. They have been logging all email outreach and responses received from these contacts. Tracking applications considered to be public facing is a priority in their work toward compliance, and they have contacted all vendors that are applicable. Out of 42 contacts, they have received replies from eleven. Six have replied that they are already compliant, 3 replied they have a plan to work towards compliance, and 2 replied they had no plan, making them aware of which vendors they can continue to work with. Strategy and Innovation believe that departments should lead the next phase of the effort in contacting vendors with whom they are contracted, to discover their compliancy systems that are in place.

Transportation: The transportation staff has submitted a list of live documents under the Transportation website that need to be professionally mitigated. Common Look has been installed and used as software among staff members to assist with training and mitigation of pdfs. The addition of Common Look will help this department with their transition toward becoming ADA compliant.

Police: The Police department is continuing to research body worn camera and video accessibility options and, in the meantime, they are providing one-on-one assistance to requestors. They are offering transcription for body worn cameras and video requests. They have been actively working through documents uploaded internally to ensure they are compliant and deleting outdated records. If a staff member needs assistance, they offer one-on-one assistance.

Special Events: The Special Events team manages four websites including; AspenRecreation.com, Aspengolf.com, RedBrickAsFpen.com, and AspenSpecialEvents.com. They work with third party contractors who have helped to build these websites, and their vendors have been working hard to make all websites compliant. AspenSpecialEvents.com has been reformed in Squarespace which is being manually reviewed for color contrast, page layout, and template layouts to be ADA compliant and is planned to be launched October 2024. In 2025, the team will run an audit to determine the level of ADA compliance under WCAG 2.2. The further remediation and adjustments of AspenGolf.com have been continued through the summer of 2024. RedBrickAspen.com will continue to undergo changes, and much more work is being done on furthering the compliance of this website, and the new website version will be launched in the coming weeks of October 2024. AspenRecreation.com has undergone a major deletion of documents from its library to prioritize its remediation efforts, and further efforts are being made to address accessibility issues.

Organization wide

The organization has been awarded a grant by the state allowing the use of Common look. Licenses have been granted to a variety of staff members in different departments to use, and the City continues to look at procurement software tools to access when creating new web content.