

Digital Accessibility Plan Arapahoe County

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Table of Contents

1	Executive Summary.....	3
2	Legal Considerations and Recommendations	4
2.1	Applicable Laws.....	4
2.1.1	Colorado HB 21-1110 and Related Laws and Regulations	4
2.1.2	ADA Title II	6
2.1.3	Section 504.....	7
3	Digital Accessibility Plan.....	8
3.1	Technology Accessibility Statement.....	8
3.2	Progress-to-Date Report	8
3.3	Existing Web- and Cloud-Based Applications	9
3.3.1	Revize CMS.....	9
3.3.2	Other Existing Web- and Cloud-Based Applications	9
3.3.3	Web- and Cloud-Based Content Created by the County	10
3.4	Newly Deployed or Procured Applications.....	11
3.5	Social Media Channels	11
3.6	Accessible Documents.....	12
3.6.1	Current PDF Accessibility Technologies	12
3.6.2	Document Accessibility Flowchart	12
3.7	Training.....	13
3.8	Intergovernmental Coordination.....	13
4	Summary.....	13

1 Executive Summary

Colorado HB 21-1110 requires that Arapahoe County’s web and digital technologies conform to the W3C’s [Web Content Accessibility Guidelines \(WCAG\) 2.1 A/AA](#) and be accessible to people with disabilities by July 2025. Federal ADA regulations also require WCAG 2.1 A/AA conformance by April 2026. Both Colorado and federal regulations, however, are flexible; the Colorado Office of Information Technology (“OIT”) regulation deems a local government to have complied if it can demonstrate progress on a good faith plan for the removal of barriers in its technology, and federal regulations allow for non-compliance if it can show minimal impact on people with disabilities.

This Accessibility Plan describes how the County intends to conform its web and digital technologies to WCAG 2.1 A/AA and make the programs, services, and activities provided through these technologies accessible to people with disabilities both now and in the future. To develop this plan, the County retained Converge Accessibility (“Converge”), which has deep expertise in accessibility law and policy and is led by a former disability rights attorney from the U.S. Department of Justice.

This plan starts with a presentation of the legal and regulatory framework. Then, the plan sets forth several procedural elements (e.g. technical accessibility statement, progress-to-date reports, etc.) and technological and non-technological processes (e.g. procurement processes and document remediation strategies) that collectively ensure that the County complies with its legal requirements and meets the needs of residents with disabilities. Specifically, the plan covers:

- **Existing Technologies.** The County has hundreds of different IT applications. The County identified the business owners of these applications, developed a survey form to gather information about them, and will use the results to prioritize these applications for use case audits that will identify if and where they create real-world barriers. The County will then work with the vendors who created each technology to eliminate these barriers.
- **New and Future Technologies.** Accessibility testing and verification are expensive, and many IT products contain WCAG violations. To allocate resources effectively, the County has created a risk-based assessment tool that enables it to focus on IT products with greater exposure. This will ensure that the County meets its obligation to purchase products that best meet the OIT accessibility rules in the most cost-effective way possible.
- **Accessibility Coordinator.** In surveying its existing technologies (above), the County also asked business owners to clearly identify non-technological workarounds (e.g. contacts, telephone numbers, in-person locations, etc.) to make County services accessible to people with disabilities. This information is being made clear to County Accessibility Coordinators and posted on County websites to ensure that all County programs, services, and activities are easily available to people with disabilities through non-digital means.

- **PDF Remediation and Other Resources.** The County has thousands of PDF documents, and most were created without a focus on accessibility. The County is exploring different PDF solutions for its internal use. The County is also securing contracts with vendors specializing in PDF remediation. The County plans to make all new public-facing documents accessible after July 2025. Other documents will also be made accessible or conforming alternate versions of the same information shall be made available.
- **Training.** Converge identified areas where staff could avoid creating accessibility barriers when updating web pages or other digital content. Converge has developed training for these areas and for other aspects of the County’s digital accessibility plan. This training will be deployed to appropriate County staff and contractors.
- **Broader Coordination.** Converge and the County are working locally with other counties (including Rio Blanco County), municipalities (including the City of Centennial), and the State of Colorado to clarify the duties of local governments like Arapahoe County. Because the Americans with Disabilities Act (ADA) was recently updated to include web and digital accessibility requirements very similar to Colorado’s law, Converge and the County have been coordinating with national resources.

The County’s approach is a thoughtful balance of good government, fiscal responsibility, and access for people with disabilities. At the same time, the County has put the needs of people with disabilities first and foremost and considered how to best ensure their access to County services. Lastly, the County balanced the importance of information with the cost of remediation to avoid enormous up-front costs.

2 Legal Considerations and Recommendations

This section reviews the laws and regulations applicable to Colorado state and local governments, the risks and mitigating strategies available to them, and internal processes to help avoid or reduce liability.

2.1 Applicable Laws

2.1.1 Colorado HB 21-1110 and Related Laws and Regulations

In 2021, Colorado passed HB 21-1110. This law updated several requirements under Colorado’s Anti-Discrimination Act (CADA). It required all public entities in Colorado to make their digital and internet technologies accessible to people with disabilities by July 1, 2024. Specifically, HB 21-1110 amended the definition of discrimination under CADA to include a failure by a public entity to “fully comply, on or before July 1, 2024, with the accessibility standards for individuals with a disability established by the Office of Information Technology.” HB 21-1110 also allows aggrieved persons to sue for monetary damages equal to actual damages or a minimum of \$3,500 per violation.

Two years later, HB 21-1110 was amended by Senate Bill 23-244, which required the Colorado Office of Information Technology (OIT) to promulgate accessibility standards. On

April 14, 2024, OIT’s Accessibility Rule was [published in the Code of Colorado Regulation \(8 CCR §§ 1501-11\)](#). This rule is also [available on OIT’s website](#).

OIT’s Accessibility Rule requires that all Information and communication technology (“ICT”) comply with WCAG 2.1 A/AA. The OIT Accessibility Rule also includes important limitations. For instance, the OIT Accessibility Rule [does not require](#) entities to make ICT accessible if it is not in “[active use](#)” (i.e., in regular use by the public or current use by employees) or where doing so would fundamentally alter a program, impose an undue burden, or pose a direct threat to the health or safety of others.¹

For its technical standard, the OIT Accessibility Rule adopts the [W3C Web Content Accessibility Guidelines \(WCAG\) 2.1 A/AA](#) for software and internet-based technologies. The Rule also adopts the Federal government’s [Section 508 standards](#) for hardware.²

OIT’s Accessibility Rule sets forth five ways that a public entity will be deemed to comply with the rule:

1. **No Substantial Hindrance.** If a person with a disability can be shown not to be “substantially hindered” in accessing a public entity’s programs, services, or activities, then it will not be deemed to have violated the OIT Accessibility Rule.³ This exemption is interpreted on a case-by-case basis and should not be relied upon for overall compliance with the OIT Accessibility Rule.⁴
2. **Clear Accessibility Statement and Plan.** If a public entity uses inaccessible ICT but can show that it has a conforming Technology Accessibility Statement⁵ together with a clear plan and “good faith progress” for redressing that inaccessibility, it will be deemed to comply with the OIT Rule.⁶

While the OIT Accessibility Rule does not specify what must be included to demonstrate “good faith progress,” it notes that a plan *could* include:

- Annual status updates demonstrating progress in ICT accessibility,
- Prioritization of ICT based on usage and user impact,
- Steps taken to remove barriers,
- Timelines for removing barriers and plans for accommodating users in the interim, and

¹ [8 C.C.R. 1501-11.3, -11.4](#). The ADA includes the same limitations as the OIT Accessibility Rule. For instance, it includes exemptions for “archived web content” [28 C.F.R. § 35.201\(a\)](#), and does not require public entities to undertake actions that would constitute a fundamental alteration, undue burden or direct threat. [28 C.F.R. § 35.200\(b\)](#). As discussed below, however, the ADA also includes a number of exceptions not exempted under the OIT Accessibility Rule and thus the OIT Accessibility Rule is the stricter requirement.

² [8 C.C.R. 1501-11.5](#).

³ [8 CCR § 1501-11.7\(A\)](#).

⁴ The ADA also includes a similar exemption where the effect of noncompliance with the Title II web accessibility regulation would have a minimal impact on access for people with disabilities. [28 C.F.R. § 35.205](#).

⁵ [8 CCR § 1501-11.6](#).

⁶ [8 CCR § 1501-11.7\(B\)](#)

- Policies for regularly testing and remediating ICT.

Note that the OIT “Accessibility Plan” may include (but is slightly different from) a “Progress to Date” report under HB 24-1454, discussed below.

3. **Procurements that “Best Meet” the OIT Accessibility Rule.** In many cases, fully WCAG-compliant ICT products may not be available. To address this reality, a public entity will be deemed to comply with the OIT Accessibility Rule if it procures ICT that “best meets” the OIT Accessibility Rule’s technical standards and the public entity’s business needs.⁷
4. **Conforming Alternate Versions Permitted.** A public entity may use conforming alternate versions of ICT to comply with these rules only where it is not possible or practical to make the ICT directly accessible due to undue burden, safety, or legal limitations. Examples of conforming alternate versions could include, for instance, a website that provides identical information to a geographic information system in a non-graphical format, or a web application that uses accessible controls as an alternative to one with inaccessible controls.⁸
5. **Traditional ADA Defenses.** Public entities are not required to make ICT meet the OIT Accessibility Rule if doing so would constitute an undue burden, fundamental alteration, or pose a direct threat.⁹

On May 24, 2024, Colorado passed [HB 24-1454](#). This law extended the July 2024 deadline for public entities to meet the OIT Accessibility Rule to July 1, 2025, if a public entity could (before July 1, 2024) establish “good faith efforts” that include,

1. A “progress-to-date report that demonstrates concrete and specific efforts towards compliance on the entity’s or agency’s front-facing web pages”;
2. Quarterly updates on the “progress-to-date” report; and
3. A clear, easy-to-find process for requesting redress of inaccessible ICT (including contact options that are not dependent on web access or digital accessibility and that are prominently displayed on all front-facing web pages).

2.1.2 ADA Title II

Title II of the Americans with Disabilities Act (ADA) covers the responsibilities of state and local governments concerning “qualified individuals with disabilities.”¹⁰ The term “qualified individuals with disabilities” refers to individuals with disabilities who would otherwise qualify for participation or benefits in that government’s programs, services, or activities. Among Title II’s numerous requirements, Title II requires that state and local governments ensure that communications with people with disabilities are equally effective to communications with people without disabilities. This is relevant because internet and

⁷ [8 CCR § 1501-11.7\(C\)](#). This provision essentially mirrors the requirements for federal agencies under Section 508 of the Rehabilitation Act. [36 C.F.R. Part 1194 App. A E202.7](#).

⁸ [8 CCR §§ 1501-11.7\(D\)](#), -11.8.

⁹ [8 CCR §§ 1501-11.7\(E\)](#).

¹⁰ [28 C.F.R. § 35.130](#).

digital technologies are often a means of communicating with members of the public. Title II of the ADA is enforced by the U.S. Department of Justice (DOJ) and by private litigation.

On April 24, 2024, DOJ published its Final Rule on *Accessibility of Web Information and Services of State and Local Governments*.¹¹ This new regulation added a new Subpart H¹² to its existing Title II regulation and requires that state and local governments make their web and mobile app technologies comply with WCAG 2.1 A/AA. Like Colorado law, the new ADA Title II regulation permits public entities to use “conforming alternate versions”¹³ for inaccessible technologies and, similar to OIT’s carve-out for ICT barriers that do not “substantially hinder” access to services, the ADA Title II regulation allows the use of inaccessible technologies that have a “minimal impact on access.”

Public entities must comply with the new DOJ rule by April 26, 2026 (if total population is 50,000 or more) or April 26, 2027, otherwise. The DOJ rule also exempts five categories of content that the OIT Accessibility Rule does not exempt. These five categories are (1) archived web content, (2) pre-existing conventional electronic documents, (3) content posted by a third party, (4) individualized, password-protected or otherwise secured conventional electronic documents, and (5) preexisting social media posts. This means that HB 21-1110 is stricter than the ADA and so the County should focus on complying first with Colorado law.

2.1.3 Section 504

Section 504 of the Rehabilitation Act of 1973 covers federal agencies and federally funded entities. Section 504 covers the entire instrumentality of a state or local government if any part of it receives federal financial assistance.¹⁴ Violations of Section 504 carry the risk of an investigation by the funding agency or the U.S. Department of Justice. Violating Section 504 also risks losing federal funding.

There has been movement recently to use Section 504 to affect web accessibility. For instance, on May 9, 2024, the U.S. Department of Health and Human Services (HHS) issued its final rule updating its Section 504 regulation (which affects virtually every health care provider, insurance plan, and most health social service facility across the country). The new regulations incorporate several updates, including a requirement for websites of these entities that mirrors the WCAG 2.1 A/AA requirement in DOJ’s new Title II regulations (HHS worked in parallel with DOJ to ensure that these sections of its regulation were identical).

¹¹ [28 Fed. Reg. 31,320](#) (Apr. 24, 2024).

¹² [28 C.F.R. § 35.200 et seq.](#)

¹³ [28 C.F.R. § 35.202.](#)

¹⁴ Section 504’s coverage extends far beyond the program receiving federal funding. After the Supreme Court’s decision in *Grove City College v. Bell*, 465 U.S. 555 (1984), which limited Section 504’s protections only to the specific program receiving funding, Congress responded by passing the Civil Rights Restoration Act of 1987, which expanded the definition of a “program or activity” to cover the entire entity when any part of it receives federal funding.

3 Digital Accessibility Plan

The County's digital accessibility plan focuses primarily on HB 21-1110 compliance. Because the new DOJ Title II web accessibility regulation is not as stringent, this approach should also mean that the County will comply with it.

3.1 Technology Accessibility Statement

The County has developed a Technology Accessibility Statement that complies with the OIT Accessibility Rule.¹⁵ This statement identifies the County's commitment to meeting WCAG 2.1 A/AA and the needs of people with disabilities. It also directs individuals to the County's ADA Coordinator if they encounter difficulty accessing programs, services, and activities (including those provided through digital technology). This statement is available as a link from the footer section of every County webpage.

This accessibility statement fulfills the OIT Accessibility Rule and bolsters HB 21-1110 and ADA Title II compliance. The County's goal is to ensure that all its programs, services, and activities are available just as conveniently through digital and non-digital means. In addition to offering residents the most accessible and convenient government possible, it also means that people with disabilities are not substantially hindered and can effectively engage in County programs.¹⁶ It may also mean that existing technological barriers would have a minimal impact on access for people with disabilities.¹⁷

3.2 Progress-to-Date Report

To ensure compliance until July 2025, the County has created and posted a progress-to-date report demonstrating its good faith in making its technology accessible for people with disabilities. This progress-to-date report is intended to meet HB 24-1454 and is currently available alongside the Technology Accessibility Statement. A link can be found in the footer section of all County web pages. This report will be updated quarterly as the County progresses toward continually improved accessibility.

The County's report provides a very quick summary of the County's approach towards WCAG compliance in both its front-facing web pages and its overall digital technologies.

By posting the report and all quarterly updates on the County's front-facing websites, the County fully meets HB 24-1454.

¹⁵ [8 CCR §§ 1501-11.6](#). The OIT Accessibility Rule specifies the essential elements of this accessibility statement to be a commitment and means by which people with disabilities can request and obtain meaningful access to the services made available through the technology. This has been met by identifying the County's ADA Coordinator and telephone number.

¹⁶ [8 CCR §§ 1501-11.7\(A\)](#).

¹⁷ [28 C.F.R. § 35.205](#).

3.3 Existing Web- and Cloud-Based Applications

3.3.1 CMS

The County main website uses a product from a particular vendor as its primary content management system (CMS). Converge has worked with the County and performed an audit of its CMS. This audit identified some inconsistencies with WCAG that may pose potential barriers for people with disabilities.

The County will place a priority on working to eliminate these barriers. In addition, the County will approach the vendor to resolve any platform-related barriers. These barriers should be addressed by 2025 Q1.

3.3.2 Other Existing Web- and Cloud-Based Applications

The County has identified a few hundred web- and cloud-based applications in addition to the business owners of each application. The public-facing applications link to the County's main website or exist as standalone URLs. The internal-facing applications exist either on the County's intranet or require a separate login.

Converge then helped the County develop a questionnaire to help the County prioritize these applications for accessibility. This questionnaire also requested information on several other factors, including

- **Exposure.** How many individuals are affected by the application? Is the application public-facing or internal only?
- **Cost.** What was the cost of the application? What is the cost (including disruption for the County and its customers) of replacing the application?
- **Impact.** Are there people with disabilities who use (or are likely to use) the application or its alternatives?
- **General Use and Use Cases.** What do people use the application for? What is a step-by-step process for accessing the top three uses of the application?
- **Workarounds.** Who can people with disabilities contact (e.g. by telephone) in order to get the same services offered through the application? What are the specific steps needed to receive these same services?

This questionnaire serves several valuable purposes, including

- **Rapid Prioritization.** The data from each questionnaire is designed in a way that lets the County rapidly coalesce this information into a single spreadsheet. This will enable the County to focus first on higher-risk applications while keeping the accessibility of lower-risk applications in its overall accessibility plan.
- **Efficiency.** As described below, the County will need to have an accessibility consulting firm assess the accessibility of common use cases in each application. Asking County staff to first identify the steps in these use cases will speed up this process while saving County resources.
- **Better Services and Lower Risk.** This process enables the County ADA Coordinators to respond more quickly and uniformly to people with disabilities. The

questionnaire also requires County staff to consider how people with disabilities can access County services **outside of** these applications while memorializing exactly how to access these services without substantial hindrance¹⁸ and with minimal impact¹⁹ on people with disabilities.

Once prioritized, Converge and the County will focus on each technology one-by-one to remove existing barriers. This process will involve the following steps:

1. **Obtain Accessibility Information from Vendors.** First, the County will reach out to each of its vendors about accessibility. Next, the County will determine if the vendor has updated the application to include accessibility features that may have been added since the County's last update. It will also ask each vendor to provide either a Voluntary Product Accessibility Template (VPAT) or Accessibility Conformance Report (ACR) documenting the product's accessibility. The County will also ask each vendor if they are currently making accessibility changes to meet the needs of customers.
2. **Review and Refine Use Cases.** Converge will quickly assess the use cases provided by County staff and develop a brief set of test steps that a third-party accessibility team can test for WCAG compliance and develop a report of identified barriers.
3. **Conduct Testing and Reporting.** The County is in the process of identifying efficient testing resources that can perform effective use case testing based on the use cases identified by Converge. It will then have applications tested for accessibility.
4. **Work with Vendors to Resolve Issues.** The County will then work with its vendors to have the barriers in the applications remediated. If the vendor fails to cooperate in removing the barriers, then the County will consider replacing the application.
5. **Work Internally to Remove Barriers Created by County.** Some barriers identified in testing may be due to County staff. As described below, the County will work to eliminate these barriers.

As accessibility improvements are made, these changes will be captured in the accessibility questionnaire. Because this data easily coalesces in a spreadsheet, it gives the County a quick scorecard of accessibility improvements that will keep its progress on accessibility improvements on track.

3.3.3 Web- and Cloud-Based Content Created by the County

In addition to the barriers created by the County's vendors, there can be barriers created by County staff. Because the rich text editors in every modern CMS strictly limit the type of content that staff can enter into the CMS, there are only six areas where staff can create errors. These areas include:

- images, alternative text, and images of text,
- headings,

¹⁸ [8 CCR § 1501-11.7\(A\)](#).

¹⁹ [28 C.F.R. § 35.205](#).

- lists,
- color contrast,
- tables,
- videos, iFrames and other custom content (captioning and audio description)

Converge has developed a comprehensive two-part solution for addressing these problems.

1. **Automated Testing.** The County is exploring automated testing solutions. This will enable the County to rapidly spot all of these errors, except lack of captioning and audio descriptions (which is rare but can be spotted by County staff).
2. **Training.** As described in more detail in *3.7 Training* (below), Converge has developed a comprehensive set of training modules to help County staff understand their duties for complying with HB 21-1110 and ADA Title II. This training includes a detailed module that is specific to digital content creators. This training describes how to create conforming content and how to easily test content (using tools freely available on the internet) to ensure that it is WCAG-compliant.

3.4 Newly Deployed or Procured Applications

New technologies create both opportunities and risks for the County’s accessibility. If accessibility is considered early and often, new technologies can open opportunities for people with disabilities. Surprisingly, however, few modern applications are fully accessible so new applications also create the risk of creating new barriers for people with disabilities. The OIT Accessibility Rule, therefore, deems public entities to comply where they can demonstrate that they selected a technology that “best meets” its rule.²⁰

Unfortunately, testing products for compliance with WCAG and the OIT Accessibility Rule is costly and difficult. Converge has helped the County create a risk matrix that requires a higher degree of vetting for applications that have a larger impact. For instance, if the County wanted to buy a high-profile application that the public will use, the risk matrix may require the County to consider at least three products and have each independently tested for accessibility. The risk matrix may also require vendors to make any accessibility changes that are not accurately stated in their Voluntary Product Accessibility Template or Accessibility Conformance Report.

The County’s risk matrix also identifies specific contracts or RFP clauses appropriate to each risk level, personnel within the County who must approve each risk determination, and the recordkeeping requirements for each level of risk. This is a very comprehensive model that maximizes opportunities for people with disabilities while reducing cost and risk for the County.

3.5 Social Media Channels

The County makes regular use of social media sites. For instance, the County posts content on Instagram, Facebook, X, Nextdoor, etc. to share County information,

²⁰ [8 CCR § 1501-11.7\(C\)](#).

memorialize past events, or announce upcoming events. It also uses LinkedIn to provide business and professional-oriented content. All of these platforms allow alt text to be easily inserted for images—topics that will be thoroughly covered in training.

While social media sites have high exposure, these are generally low risk.

3.6 Accessible Documents

Accessible documents—notably, Adobe Acrobat documents (PDFs)—pose an enormous challenge for most medium- and large-sized organizations for several reasons. First, many organizations have been creating PDFs for years without regard to their accessibility. Being required to suddenly make hundreds or thousands of documents accessible can be overwhelming and costly. Second, it can be quite difficult to make accessible PDFs, and common software (e.g., Microsoft Word) does not automatically generate accessible PDFs. Third, there are several different technologies for creating accessible PDFs and countless vendors specializing in PDF remediation. This section describes these technologies and how the County will leverage them to meet the needs of residents with disabilities

3.6.1 Current PDF Accessibility Technologies

A PDF document includes an image with an underlying structure of meta data that gives meaning to that image. One layer of such data is the “tag structure” (similar to HTML tags for web page accessibility) that needs to be encoded to allow a PDF to be read by a screen reader or other assistive technology. Therefore, making a PDF accessible is “tagging” the PDF to create that tag structure and then ensuring that the tag structure accurately and meaningfully reproduces the visual content and meaning of the document.

There are several different categories of products and services that can provide this tagging in order to make PDF documents accessible. These include:

- PDF remediation products and services,
- Accessibility plug-ins for common office applications,
- Specialized PDF accessibility training,
- Templated documents, and
- Conforming alternative versions.

3.6.2 Document Accessibility Flowchart

Because of the different products and services for making PDF documents accessible, choosing when and how to make documents accessible is more complicated than prioritizing applications for accessibility.

Converge has helped the County develop a flowchart to help the County determine when and how it should make documents accessible to users with disabilities. At a minimum, this process will enable the County to provide accessible documents to residents upon request. On a proactive level, this process will also provide the County with the tools and strategies it needs to make documents accessible as needed.

3.7 Training

Training is critical to the County's efforts to meet HB 21-1110. Converge has developed three training components that the County will use.

1. **Overview of Digital Accessibility.** This overview module is for all County employees. It introduces County staff and contractors to digital accessibility, the various laws requiring digital accessibility, and why it is important for the County to make its technology accessible to people with disabilities.
2. **Accessible Content and Document Creation.** This module focuses on two groups. First, it teaches web content creators how to avoid the six errors described above in [Web- and Cloud-Based Content Created by the County](#). It also teaches students how to use free tools to evaluate content and ensure it complies with WCAG. This module addresses the second group of staff and contractors who create electronic documents on behalf of the County and what these individuals need to know to help the County meet its obligations.
3. **Procurement and Other Topics.** The third module focuses on staff purchasing ICT for or on behalf of the County, including purchase card holders. This training will remind staff to meet HB 21-1110. It will also introduce students about the risk-based matrix described above in [3.4 Newly Deployed or Procured Applications](#).

This training is highly engaging and animated to meet the County's specific needs. It is also video-based so students can refer to it during the course of their work.

3.8 Intergovernmental Coordination

The County is not alone in facing the challenge of making its ICT accessible for people with disabilities. The County actively participates in the [Colorado Government Association of Information Technology \(CGAIT\)](#) and the [National Association of Counties \(NACo\)](#). The County also works with the City of Centennial, which is a member of the [Colorado Municipal League \(CML\)](#) and which has been highly active in HB 21-1110 implementation. The County and these organizations have been actively seeking ways to share resources and coordinate their accessibility efforts. For instance, when a local government tests a licensing application and works with its vendor to make it meet WCAG, other local governments using the same application will waste time and resources duplicating the same work. While the County is focusing on its higher-priority applications, coordinated efforts should help the County simultaneously improve the accessibility of its lower-priority applications.

4 Summary

The County is following a solid plan for meeting digital accessibility. It understands how to assess and remediate its current technologies. It also has created a repeatable process for addressing new technologies and document accessibility. It will soon be deploying a detailed training plan to ensure that County personnel and contractors understand how to keep the County in compliance.

If you have any questions about the County's Digital Accessibility Plan, please contact Nicolle Rosecrans at (303) 768-8733 or nrosecrans@arapahoegov.com.