Northern Water Digital Accessibility Plan

July 2024 Progress Report

Northern Water

TABLE OF CONTENTS

INTRODUCTION

Northern Water is committed to providing online services that are accessible to the widest possible audience, regardless of technology or ability. Our goal is to deliver an online experience that achieves "Level AA" conformance according to the [Web Content Accessibility Guidelines v2.1 (WCAG 2.1)](#).

The following accessibility plan assists with a long-term strategic approach to continue improvements to the accessibility of Northern Water information. This document summarizes the organization's web accessibility self-evaluation, transition plan and ongoing management plan.

- An overview of the State of Colorado online accessibility requirements.
- Identifying public-facing applications and portable document types that may create barriers to digital accessibility.
- Testing and evaluations of www.northernwater.org.
- A comprehensive transition plan, which includes future milestones.
- An overview of the organization's digital accessibility policy and guidelines.
- A toolbox with digital accessibility resources.

OVERVIEW OF COLORADO ACCESSIBILITY LAW

[House Bill 21-1110](#) required the Colorado Office of Information Technology (OIT) to establish accessibility standards for individuals with a disability and added language to the Colorado Anti-Discrimination Act that expands the prohibition against discrimination of an individual with a disability. This specifically relates to accessibility of government information technology and digital content. The added provisions include:

- Prohibiting an individual 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 standards established by the OIT.

ACCESSIBILITY COMPLIANCE GRACE PERIOD

[House Bill 24-1454](#) provides a grace period until July 1, 2025, in which a public entity or state agency is immune from liability for noncompliance with OTI's accessibility standards as long as they demonstrate good faith efforts toward compliance. Good faith efforts involve publishing a technology accessibility statement, and showing progress in removing accessibility barriers through annual updates, prioritization strategies and testing policies.

DIGITAL SERVICES INVENTORY

- Northern Water's website at www.northernwater.org
  - Remediation In Progress – AA compliance met on automated scans, manual scans and PDF remediation in progress
- Northern Integrated Supply Project website at www.NISPwater.org
  - Remediation In Progress – AA compliance met on automated scans, manual scans and PDF remediation in progress
- Chimney Hollow Reservoir Project website at www.chimneyhollow.org
  - Remediation In Progress – AA compliance met on automated scans, manual scans and PDF remediation in progress
- Granicus – agenda management software and email marketing.
  - The Granicus govDelivery website states they conform to WCAG standards up to WCAG 2.1 AA guidelines and section 508. As a result of their conformity, govDelivery has earned the WeCo Seal of Approval for Accessibility. https://support.granicus.com/s/article/govDelivery-Statement-of-Accessibility
- Microsoft (Office 365, Dynamics 365 Customer Engagement Sales)
  - The Accessibility Conformance Reports (ACR) web page describes how Microsoft products and services support the recognized global accessibility standards of Section 508 of the US Rehabilitation Act of 1973, the Web Content Accessibility Guidelines (WCAG) and ETSI EN 301 549.
  - https://www.microsoft.com/en-us/accessibility/conformance-reports, search for specific products from this page
- Infor – talent acquisition management
  - Voluntary Program Accessibility Template (VPAT) on file
- ESRI Geospatial Information Systems
  - https://pro.arcgis.com/en/pro-app/latest/get-started/overview-of-accessibility.htm
- KISTERS Data portal at www.data.northernwater.org
  - Remediation In Progress

The Information Technology Department Manager will work with external software vendors to ensure that all agreements and delivery of platforms meet WCAG 2.1 Level AA compliance.

TESTING TOOLS AND TECHNIQUES

Northern Water has incorporated a variety of tools, techniques and processes to identify accessibility barriers and meet existing and new assistive technology needs. The following tools are not intended to represent an inclusive list, but a shortlist of tools and processes that the organization will use in its accessibility initiatives.

SiteImprove
Northern Water utilizes SiteImprove to give an immediate overview of the organization's website compliance levels, which removes guesswork and provides focus in order to meet current web accessibility standards (WCAG 2.1, AA). Both automated and manual scanning is being conducted.

PDF Remediation – Allyant
Northern Water utilizes Allyant to remediate PDF documents to a variety of formats.

MANUAL TESTING AND EVALUATIONS

Review Process
In addition to the automated testing tool described above, Northern Water is working with Siteimprove to complete manual testing for www.northernwater.org, www.chimneyhollow.org and www.nispwater.org. Siteimprove will utilize the success criteria of WCAG 2.1 AA to manually evaluate our online technologies and documents and provide Northern Water staff with appropriate fixes to implement to meet full compliance by July 1, 2025.

Recommendations
Northern Water continues to work toward full compliance to meet WCAG 2.1 AA conformance requirements.
- We have achieved AA compliance through automated scanning, which will continue ongoing. Staff will mitigate any issues that arise.
- The manual testing process and PDF remediation is in progress.

THE TRANSITION PLAN

Year to Year Plan Overview
- 2022: Planning
- 2023: Implementation of scanning software, testing
- 2024-2025: Training for website content administrators and developers, remediation and maintaining technologies

REMEDIATION AND COMPLIANCE EFFORTS

Northern Water has a core Digital Accessibility Committee that is leading the compliance efforts. It is comprised of:
- Communications Department Manager/ADA Coordinator
- Digital Communications Specialist
- Information Technology Department Manager
- Senior Application Developer
- Application Developer I

The Digital Accessibility Committee will conduct weekly accessibility assessments of all public facing websites, portable document types, user interfaces and other communication tools such as telecommunications, video conferencing, and other interactive devices such as kiosks and digital information boards. The status will be updated at the end of each quarter throughout the year.

Training and Awareness
Training is an initial investment that pays off as understanding of accessibility increases and it becomes more common practice. Increased knowledge should result in more accessible implementations first time, helping to reduce evaluation and rework costs and limit risk. The Digital Accessibility Committee is completing training as they navigate the process. The ADA Coordinator is developing a training plan for general staff to take part in online learning relevant to their role.

Goals
1. In progress - Develop training plan.
2. In progress - Host general staff awareness training annually starting in 2024.
3. In progress - Create a role-based training program and have staff in a particular role utilizing the training program.

Training and Awareness Status
Updated 7-1-2024
- Digital Accessibility Committee
    o Implemented training in 2023
    o Number of employees trained: 4
    o Ongoing training continues
- General Staff Training Plan – in progress
    o Implement in 2024
    o Number of employees trained: TBD
    o Total Employees: TBD
    o Estimated Date of Completion: TBD

Documents

Assessments of these documents incorporate checklists to ensure barriers are removed in the production of digital content by encouraging adherence to the following principles:
- Tags: Meaningful content is marked with appropriate semantic tags – this is a "tagged" document. This includes a correct heading structure.
- Reading Order: Document structure tree must reflect the reading order of the document.
- Title: A document title must be given.
- Language: The language of all content must be noted.
- Images: Pictorial elements must have alternative text or be marked as decorative images.
- Tables: Tables must be labeled appropriately and include a correct table header and caption.
- Color: Color should not be the only way to convey content or distinguish visual elements. Text colors should have sufficient color contrast with background colors (WCAG 2.1 Level AA requires contrast to be 4.5:1). Add shapes if color is used to indicate status.

Goal
- Complete - Initial assessment of portable documents to be completed by Jan. 1, 2024, and a path will be identified for document remediation or conversion to mobile responsive content.
- In progress - Digital Accessibility Committee continues to remediate PDFs. The remediation status will be updated each quarter throughout the year.

Policies and Guidelines
The Digital Accessibility Committee will create online PDF guidelines and workflows in order to create an easy to use and consistent process for ensuring documents for online, social media, video and graphic design meet WCAG 2.1 Level AA compliance.

COMPLIANCE STATUS – JULY 2024

The Digital Accessibility Committee meets regularly in response to the Digital Accessibility Law. The items listed below are the primary efforts and activities undertaken by staff.

- Northern Water staff has acquired and put in place scanning software from Siteimprove, which provides both automated and manual scans.
  - Automated Scans – As of June 14, 2024, Northern Water has achieved 100 percent compliance of AA standards through its automated scans.
  - Manual Scans and Testing – In progress
  - PDF remediation – In progress
  - www.northernwater.org
    - 913 Total Pages
- Northern Water has developed and implemented an Accessibility Statement and Complaint Process that is outlined on a new [Accessibility](#) page on our website.
- Standardized language has been developed, and all new contracts are being reviewed to ensure that the appropriate contract language is included to achieve compliance with the Digital Accessibility Law and its requirements.
- The Digital Accessibility Plan was finalized and posted to our website in July 2024.
- Digital accessibility training for key Northern Water staff, outside of the Digital Accessibility Committee, has been researched and reviewed and will be implemented by end of year 2024. A formal training plan is in progress.
- Staff has researched and are in the process of acquiring digital hearing enhancement devices for use in all public meetings.
- The IT Department has recently upgraded all staff computers to Windows 11, which provides an enhanced screen reader with more natural-sounding voices, enhanced voice access to control the computer hands free, and live captions for video captioning.

Digital Accessibility Policies, Guidelines and Resources

DIGITAL ACCESSIBILITY STATEMENT

Updated: June 14, 2024

Northern Water is committed to serving all community members and we strive to ensure that our website is accessible to everyone. Our website is in the process of being updated to meet the requirements of Colorado's statewide web accessibility standards and comply with the [Web Content Accessibility Guidelines (WCAG 2.1) AA Standards](#).

- Northern Water uses Siteimprove to give an immediate overview of the organization's website compliance levels. Both automated and manual scanning is utilized.
- [Automated Scans](#) – On June 14, 2024, Northern Water achieved 100 percent compliance of AA standards through its automated scans.
- Manual Scans – In progress
- PDF Remediation – In progress

ACCESSIBILITY STATEMENT

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA") and Section 504 of the Rehabilitation Act of 1973, the Northern Colorado Water Conservancy District ("Northern Water") will not discriminate against qualified individuals with disabilities on the basis of disability in its facilities, services, programs or activities.

Northern Water will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services and activities. Northern Water will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Northern Water's programs, services and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing or vision impairments. Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service or activity of Northern Water, should contact Northern Water's ADA Coordinator no later than five (5) business days before the scheduled event. Please contact the ADA Coordinator via email at accessibility@northernwater.org or by calling 800-369-7246.

Neither the ADA nor Section 504 of the Rehabilitation Act of 1973 require Northern Water to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

COMPLAINT PROCESS

A complaint process has been established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA") 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 facilities, services, activities,

programs or benefits by Northern Water. Northern Water's Employee Handbook governs employment-related complaints of disability discrimination.

A complaint regarding the provision of facilities, services, activities, programs or benefits by Northern Water 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. To make a complaint, please complete the ADA Complaint Form and return it to the ADA Coordinator (submission instructions are on the form). If you prefer to make a verbal complaint, call 800-369-7246 and ask to speak to Northern Water's ADA Coordinator. If you need assistance filing a complaint, including sign language assistance, documents in Braille or other ways of making information and communication accessible, please contact Northern Water's ADA Coordinator via email at accessibility@northernwater.org or by calling 800-369-7246.

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

Kristi Ritter, ADA Coordinator
Northern Water, 220 Water Ave., Berthoud, CO 80513
accessibility@northernwater.org

Response Timeline
Within fifteen (15) calendar days after receipt of the complaint, Northern Water's ADA Coordinator or their designee will meet with the complainant to discuss the complaint and the possible resolutions. Within fifteen (15) calendar days of the meeting, Northern Water's ADA Coordinator or their 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 Northern Water and offer options for substantive resolution of the complaint. If the response by Northern Water's ADA Coordinator or their designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within fifteen (15) calendar days after receipt of the response to the Director of Finance and Administration ("Division Director") or their designee.

Within thirty (30) calendar days after receipt of the appeal, the Division Director will designate a third party (not a Northern Water employee) to act as appeal officer (the "Appeal Officer"). The Appeal Officer shall attempt to meet with the complainant to discuss the complaint and possible resolution. The Appeal Officer will be an attorney or someone who is well-versed in disability law, rules and regulations. Within forty-five (45) calendar days after the meeting, the Division Director or their designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint. Northern Water's ADA Coordinator or their designee and the Division Director or their designee may extend the deadlines noted herein for cause and with notification to the complainant.

All written complaints received by Northern Water's ADA Coordinator or their designee, appeals to the Division Director or their designee, and responses from these two offices will be retained by the Northern Water for at least three years.

ACCOMMODATION REQUESTS

Online accessibility-related accommodation requests or issue identification should be submitted via a [form](#) or via email at accessibility@northernwater.org. This is the information required to submit an accommodation request:

1. Name of the person initiating the request or identifying an issue
2. Address
3. Phone number
4. Please provide a complete description of the specific request/issue
5. Program or location of the issue on the website

Alternative means of submitting an issue/request, such as personal interviews or a tape recording of the issue/request will be accepted for persons with disabilities upon request. Though personal details are required to adequately record and respond to the issue/request, these details will be treated with the utmost confidentiality except as required otherwise by Colorado Open Records Act.

Response timeline is the same as the Compliant Process on page XX.

GRIEVANCE PROCEDURE

Under Title II of 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") and Section 504 of the Rehabilitation Act. 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, Northern Water's Digital Accessibility Plan or benefits by Northern Water. 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.

- [Submit a Complaint or Request for Modification](#)

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

Kristi Ritter, ADA Coordinator
Northern Water, 220 Water Ave., Berthoud, CO 80513
accessibility@northernwater.org
Response Timeline

Response timeline is the same as the Compliant Process on page 8.

Complaints may also be filed with the following state and federal agencies:

Colorado Civil Rights Division
1560 Broadway
Lobby Level Welcome Center
Denver, CO 80202

Phone: (303) 894-2997
V/TTD—Relay: 711
Fax: (303) 894-7830
Email: DORA_CCRD@state.co.us
Colorado Civil Rights Division Website

U.S. Department of Justice
950 Pennsylvania Avenue, NW
Civil Rights Division
Disability Rights Section – 1425 NYAV
Washington, DC 20530
Fax: (202) 307-1197
U.S. Department of Justice's Website

EMPLOYMENT

Northern Water provides equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, sex, marital status, sexual orientation, gender identity, national origin, disability, genetics, veteran status or other legally protected characteristics. Northern Water complies with applicable state and local laws governing nondiscrimination in employment in every location in which the company has facilities. Northern Water also prohibits any form of workplace harassment in accordance with these laws. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

Toolbox

ACCESSIBILITY PRINCIPLES

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

- Perceivable: This principle refers to making sure that web content can be perceived by all users. This includes providing text alternatives for non-text content, such as images and videos, and making sure that content is presented in a clear and easy-to-read format.
- Operable: This principle is about ensuring that web content is operable by all users, regardless of their abilities. This includes providing keyboard accessibility, making sure that users can easily navigate through the site, and avoiding any content that could cause seizures or other physical reactions.
- Understandable: This principle is about making sure that web content is understandable to all users. This includes using clear and simple language, organizing content in a logical and easy-to understand way, and providing feedback to users when they complete actions on the site.
- Robust: This principle is about making sure that web content is robust and can be interpreted by a wide variety of user agents, including assistive technologies. This includes using valid HTML and CSS, avoiding deprecated code, and making sure that all content is accessible via multiple platforms and devices.

Learn More About Accessibility Principles Here
WCAG Accessibility Standards Overview

PORTABLE DOCUMENT FORMAT (PDF) GUIDELINES

When will a PDF will be added to our website?

The Communications Department website administrators will upload a PDF on the website if the document meets the following criteria:

1. The document cannot be made into a news article or a landing page on the website. A news article or landing page is the best way to get information to the public to ensure full ADA compliance and mobile responsive content. It also ensures that search engines can crawl the information and get users the correct information in the fewest clicks possible.
2. The document exceeds 5 pages of content. If there are more than 5 pages associated with a document and the document cannot be split up into multiple landing pages, then that document will need to be uploaded to the website as an accessible PDF. All documents more than 5 pages must use the ADA compliant templates made available on the company Intranet. As the training plan roles out to general staff, that staff will be charged with utilizing Allyant or other PDF accessible software to remediate the document. The page limit for Allyant in 75 pages. If you document is over 75 pages then you will need to remediate it in sections and then finish the remediation process in Adobe Acrobat. Until that time, staff will need to work with the website administrators and provide ample time to make the documents accessible.

PDF Checklist

- Alt Text: Add alternative text descriptions to images to help visually impaired users understand the content of the image. The alternative text should be concise, descriptive and convey the purpose or function of the image.

- Links: Do not use "Click Here", instead use more descriptive language about the link destination like: "Visit Our Contact Us Page". Also, make sure links stand out from surrounding text. They cannot rely on color alone and must also be underlined. This style is pre-defined within the ADA templates.
- Fonts: Use Northern Water branded fonts.
- Color: Use only Northern Water branded colors and those set within the ADA templates. This will ensure that colors meet WCAG AA requirements.
- Headings: Use logical heading order (H1, H2, H3). Use the built-in style formatting tools in the ADA template.
- Tables: Use a simple table structure with defined header rows. Do not have blank cells in a table. Do not use tables for layout on pages. Add alt text to the table.

PDF Remediation Workflow
- Create an accessible document from the start using ADA templates.
- Apply Accessibility Principles (Alt Text, Heading Structure, etc.)
- Run the accessibility checker in program (Microsoft Office)
- Save and convert the final PDF to a Tagged PDF. (Save in a PDF format, not "printing" to a PDF file, select the Tagged PDF box.) This can only be done using an Adobe Acrobat license, so Communications staff may need to do final save.
- Run the PDF program's Accessibility Checker (Adobe Acrobat Pro).
  - Perform an accessibility check
  - Take note of the items that are flagged as accessibility issues
  - Go back into your source document to fix the issues that came up
  - Save the document as a tagged PDF
  - Perform another accessibility check
  - If you cannot fix the issues in the source document, then run the PDF through Allyant and fix the issues through the platform.

Naming
All document titles should be max 25 characters.
- Monthly
  - [Month Year] [Descriptive Title of Document]
  - Example: June 2022 Strategic Plan
- Specific Date
  - [Month Day, Year] [Descriptive Title of Document]
  - Example: June 10, 2022 Strategic Plan
- Yearly
  - [Year] [Descriptive Title of Document]
  - Example: 2022 Strategic Plan

Maintenance Plan
The Digital Accessibility Committee will perform a PDF accessibility audit monthly to ensure that uploaded PDFs are meeting WCAG 2.1 Level AA criteria.

WEBSITE CHECKLIST

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

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

Social Media Checklist
- Language: Use simple language that is easy to read and understand. Avoid using jargon, complex words or abbreviations that may be confusing to some users.
- ALT Text: Alt text describes the content of an image to users who may not be able to see the image. Each social media platform has the capability to add ALT text to images.
- Color: Ensure that images have enough contrast between the background and foreground colors to make it easy to read. WCAG 2.1 recommends a contrast ratio of at least 4.5:1 for normal text and 3:1 for large text.
- Video: Captioning videos makes the content accessible to individuals who are deaf or hard of hearing. Automated captions are not always accurate, so it is recommended to review and edit them for accuracy.

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

- Audio Descriptions: Provide audio descriptions for all visual content that is important to understanding the video. Ensure that the audio descriptions accurately convey the visual content. Ensure that the audio descriptions are synchronized with the video content.
- Transcripts: Provide an alternative means of accessing the video content for users who cannot view the video, such as a text-based summary.
- Flashing: Ensure that the video does not contain flashing or rapidly changing content that could cause seizures or other health issues.
- Colors: Ensure that the video content does not rely solely on color to convey information.
- Navigation: Provide a way for users to navigate to different sections of the video, such as chapters or bookmarks.

Additional Resources
- Color Contrast Checker: Check the contrast between different color combinations against WCAG standards.
- Colorado Relay (includes Spanish services) 711 or 800-337-3242: Relay Colorado is a public service that enables people with hearing or speech loss who use a teletypewriter (TTY) or other assistive device to communicate with standard telephone users.
- Rural Auxiliary Services (RAS): Provides sign language interpreting and captioning (Communication Access Realtime Translation, or CART) services