

Americans with Disabilities Act (ADA) Website and Document Compliance



Government Finance Officers Association

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Instructors

- John Fishbein
Senior Program Manager
Technical Services Center
Government Finance Officers Association (GFOA)
Phone: 312-578-2268
Email: jfishbein@gfoa.org
- Josh Jenkins
ADA/Safety Coordinator
Martin County, Florida
Phone: 772-320-3175
Email: jjenkins@martinfl.us
- Bruce Bailey
Accessibility Specialist/Information Technology Specialist
United States Access Board
Washington, DC.
Phone: 202-272-0024
Email: bailey@access-board.gov



GFOA Best Practice on Presenting Official Financial Documents on Your Government's Website

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- Benefits
 - Heightened awareness
 - Universal accessibility (range of potential users)
 - Potential for interaction with users
 - Enhanced diversity (use of different languages)
 - Facilitated analysis (can extract data)
 - Increased efficiency (reduce redundant reports)
 - Lower costs
 - Broadened potential scope (use of hyperlinks)



GFOA Best Practice on Presenting Official Financial Documents on Your Government's Website (continued)

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- Specific guidelines:
 - Consistency with hardcopy version (if any)
 - Legibility (font size and page layout/direction) should be consistent
 - Pagination (numbers pages sequentially)
 - File size
 - Security (protect document from unauthorized changes)



GFOA Best Practice on Presenting Official Financial Documents on Your Government's Website (continued)

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- Specific guidelines:
 - Placement (predominately on homepage)
 - Software compatibility
 - Features such as zooming, bookmark, facing pages and search mechanism should be available



Links

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- Budget Awards home page
 - <http://www.gfoa.org/budgetaward>

2019 Results - Distinguished Budget Presentation Award

GFOA congratulates the 683 governments awarded the Distinguished Budget Presentation Award for the fiscal year beginning 2019 (through December 31, 2019)

Additional 2019 winners will be posted once a quarter. Results are listed and can be filtered or searched using the tools below. (Note: the display shows 1,000 award winners at a time. To view the next 1,000 use the navigation found in the header.)

Budget_2019



<input type="checkbox"/>	Entity Name	State	Province	Entity Type	Number of Awa...
	Adams County	PA		County	1
	Adams County	CO		County	28
	Addison	IL		Municipality	30



Americans with Disabilities Act

Best Practices: Web Content and Public-Facing Documents



Agenda from Josh Jenkins, Martin County, FL.

- Clear idea of ADA/how it's governed
- Why ADA matters
- Successful implementation/Best practices
- Examples from case law



Agenda from Bruce Bailey (Access Board, Washington DC.)

- Overview of How People with Disabilities Use the Web
- Why we are talking about 508
- Why we are talking about WCAG
- How can I tell if my website has accessibility issues?
- If my site has issues, what do I do?



Access Board Overview

- Created in 1973: Architectural and Transportation Barriers Compliance Board
 - Independent Micro-Agency (30 staff)
- 25 Board Members
 - 13 Public Presidential Appointees
 - 12 Senior Federal Agencies Representatives
- Develop and maintain design criteria
 - Built Environment
 - Transit Vehicles
 - Telecommunications Equipment
 - Electronic and Information Technology
- Provide Technical Assistance and Training



The **ADA** became law in 1990.
The ADA is a **civil rights** law that prohibits discrimination against individuals with disabilities in **all** areas of public life.

The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else.



This includes jobs, schools, transportation, and all public *and* private places that are open to the general public.

The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else.



1 in 4 US adults (61 million) have a disability

- Most common type = mobility (1 in 7)
- After mobility, the next most common disability type is cognition, followed by independent living, hearing, vision, and self-care.

www.cdc.gov



Title **I**: discrimination - hiring/firing

Title **II**: state/local govt programs/svcs

Title **III**: public & Private/comm'l facilities

Title **IV**: telecommunications

Title **V**: exclusions

ADA defines disability as a physical or mental impairment that substantially limits one or more major life activities.



Titles I - III

Title I

- prohibits private employers, State and local governments, employment agencies and labor unions from discriminating against qualified individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, job training, and other terms, conditions, and privileges of employment.

Title II

- prohibits discrimination against qualified individuals with disabilities in all programs, activities, and services of public entities

Title III

- prohibits private places of public accommodation from discriminating against individuals with disabilities. Examples of public accommodations include privately-owned, leased or operated facilities like hotels, restaurants, retail merchants, doctor's offices, etc...



Department of Justice

"Qui Pro Domina Justitia Sequitur" (Latin: "Who prosecutes on behalf of justice")



The **DOJ** issues, enforces and provides technical assistance on the ADA regulations governing public accommodations and state and local government services, including **Title II** and **III** issues such as service animals, polling places, accessible websites, and emergency preparedness.

www.justice.gov



Question 1

What year did the ADA become law?

- a) 1990
- b) 1995
- c) 2000
- d) 2005



Changing the rules?

- The **Department of Justice** considered adding specific technical requirements to make accessible the **services, programs, or activities** State and local governments offer to the public via the Web in 2010, via 4 “**Advance Notice of Proposed Rulemaking**”
- As of December 26, 2017, these four previously announced ANPRMs are formally withdrawn.
- So...



Accessibility Guidelines WCAG 2.0

- We don't have traditional legal standards—we have **guidelines**
- DOJ says it will **not** make new rules about websites and access for disabled people, b/c the ADA already applies to websites.
- (b/c websites = “**public accommodation**” under Title III)

www.LFlegal.com



WCAG 2.0

Better to spend money on
accessibility than lawyers!

- Four principles of accessibility:
 - **Perceivable** – info/interface must be presentable to users in ways they can perceive (can't be invisible to all their senses)
 - **Operable** – navigation should be easy/functional (can't require interaction that a user can't perform)
 - **Understandable** – user interface must be presented with clear direction for processes
 - **Robust** – content must be robust enough to be interpreted reliably by wide variety of assistive technologies

www.w3.org



Question 2

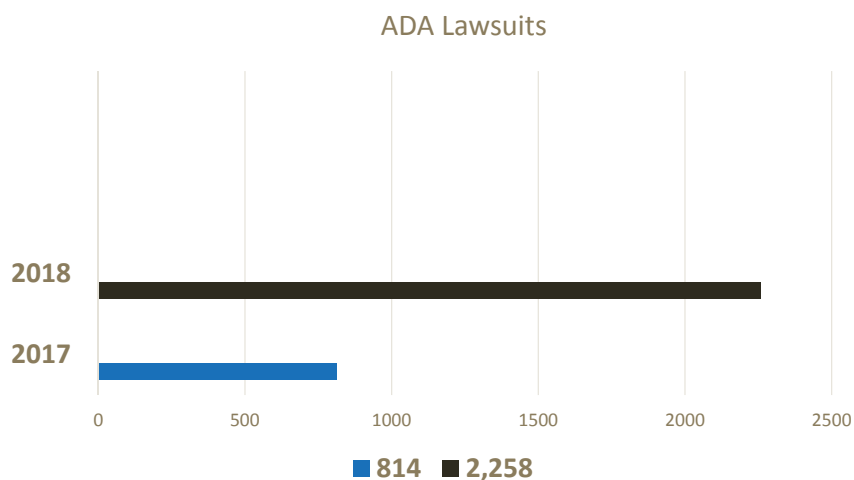
Which of the following is not one of the four basic principles of accessibility?

- a) Perceivable
- b) Operable
- c) Understandable
- d) Intuition
- e) Robust



Lawsuits are on the rise

- **ADA**-related website accessibility lawsuits filed in federal court have spiked **177%** from 2017 – 2018



Seyfarth Shaw

Majority of suits filed in Florida and New York



Local govts on alert

- Nearly **2,000** of ADA lawsuits in 2018 were related to **website accessibility** issues
- Plaintiff, Gil, who is legally blind, has filed nearly **200** lawsuits in Florida and across the country accusing government agencies, restaurants, and stores of violating the ADA by not taking steps to ensure that their websites/documents were accessible
- Winn-Dixie : prescriptions, coupons
- Orange County: website accessibility/captioning, settlement = \$19K
- Palm Beach County: website accessibility, settlement = \$9,500; videos & captioning settlement = \$15,000
- Seminole County: currently settling 2 separate suits re: website accessibility



Question 3

Where are the majority of ADA accessibility related website lawsuits filed?

- a) California and Texas
- b) New York and Florida
- c) California and Florida
- d) New York and California



Common Accessibility Errors

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- Website (HTML) or documents therein (usually PDFs) not able to be read by screen readers
- Content not organized to allow easy navigation (lacking clear titles, section headings, etc...) “illogical reading order”
- Audio information without captioning
- Poor color contrast and font choice
- Relying on imagery too much/not coding “Alt Text”



Music!

MERRY CHRISTMAS!!
YOU'RE INVITED TO
OUR COMPANY PICNIC
AT THE PARK!

BURGERS!

No dogs!

Thank you!

26

*Please remember to
bring your own
drinks paper plates
and a gift for secret
Santa!*

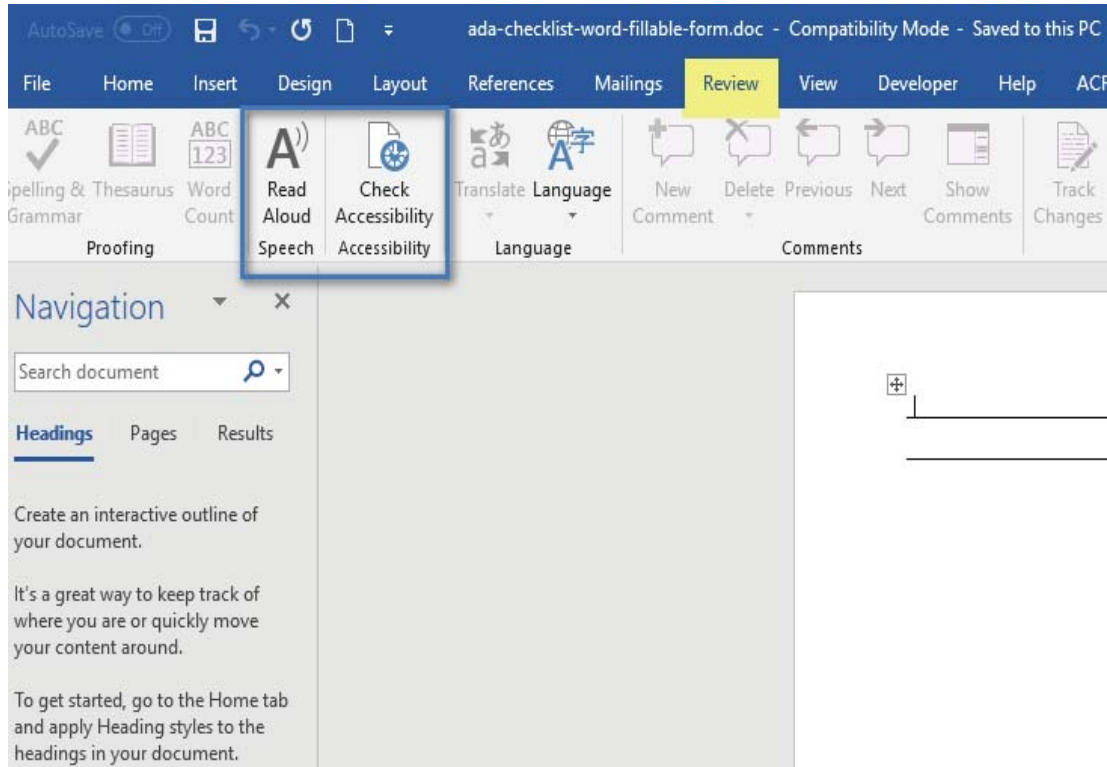
THIS is what
inaccessibility
looks like.

What can you do?



Test while you draft

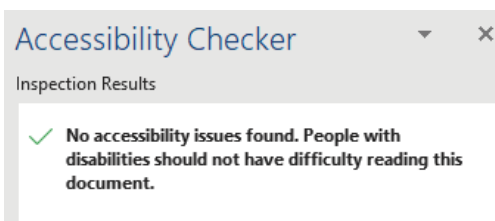
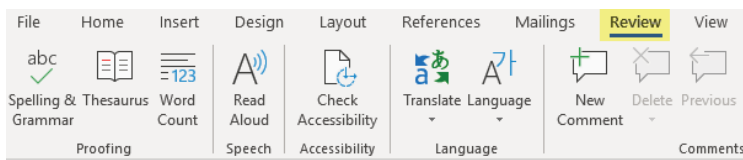
27



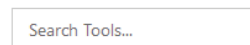
Run accessibility checker

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Word



Adobe Pro



Create PDF

Edit PDF

Export PDF

Comment

Organize Pages

Enhance Scans

Protect

Fill & Sign

Prepare Form



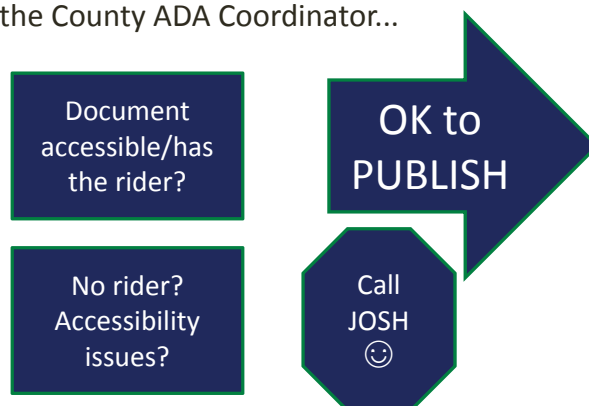
Accessibility



Public-facing documents/websites:

- Draft accessibly before publishing
- Attach ADA Rider

This document may be reproduced upon request in an alternative format by contacting the County ADA Coordinator...



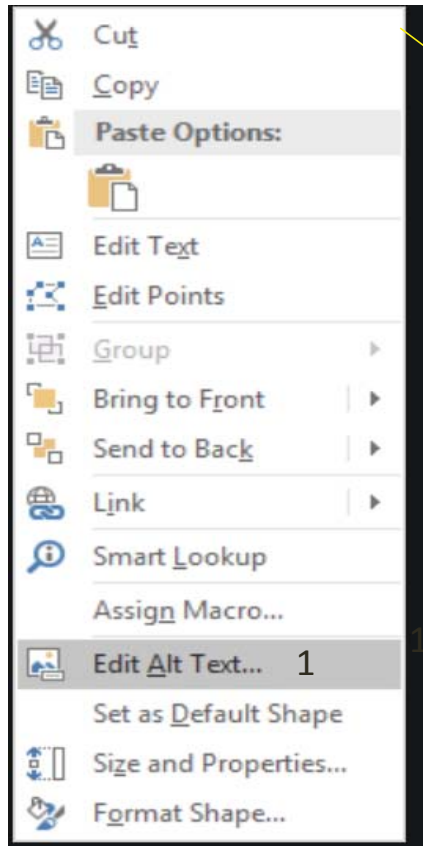
Martin County adds this rider to all public-facing documents: ³⁰

- This document may be reproduced upon request in an alternative format by contacting the County ADA Coordinator (772) 320-3131, the County Administration Office (772) 288-5400, Florida Relay 711, or by completing our accessibility feedback form at www.martin.fl.us/accessibility-feedback.

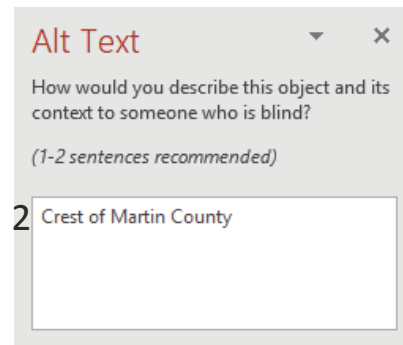
HEADS UP: AVOID PLACING IT IN THE
HEADER OR FOOTER



Right
click
menu



How to add "Alt Text" to an image³¹



Drafting accessibly

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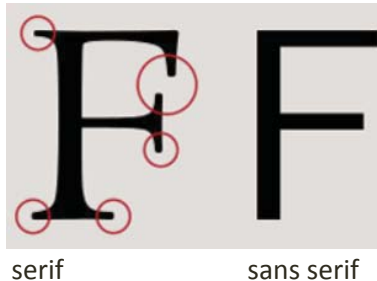
- Logical reading order (L to R, top to bottom)
- Add alt-text to images
- No (static) images of text
- Links: must be understood out of context/not rely on color:
"Click [here](#) for more info." 🗑️
"Our [park finder map](#) has all the info you need to have fun." 👍
- File names: relevant, no special characters

We are making what are visual queues for the sighted, into functional queues for vision impaired users.



Drafting accessibly...

- Using tables? Have a purpose (b/c of all the work...you'll have to appropriately tag/nest each layer of the hierarchy, and account for expected sums at the bottom of each column...)
- Use “sans serif” fonts: Tahoma, Calibri, Helvetica, Arial, Verdana
Widely contested, and you can find varied opinions...



www.fonts.com



Section 508 Electronic Content

- E205.2 Public Facing
 - Electronic content that is public facing shall conform to the accessibility requirements specified in E205.4 [i.e., WCAG 2.0 Level AA]
- E205.3 Agency Official Communication
 - Electronic content that is not public facing shall conform to the accessibility requirements specified in E205.4 when such content constitutes official business and is communicated by an agency through one or more of the following...



Section 508 Agency Official Communication (E205.3)

- An emergency notification;
- An initial or final decision adjudicating an administrative claim or proceeding;
- An internal or external program or policy announcement;
- A notice of benefits, program eligibility, employment opportunity, or personnel action;
- A formal acknowledgement of receipt;
- A survey questionnaire;
- A template or form;
- Educational or training materials; or
- Intranet content designed as a Web page.



Covered Content: fillable forms

PLEASE PRINT

Last Name: _____ First Name: _____ MI: _____

Street Address: _____ Bldg.: _____ Apt.: _____

Building Complex or Development Name: _____

City: _____ State: _____ Zip Code: _____

Telephone: (____) _____ Date of Birth: ____/____/____

- An electronic document template used to create official agency documents or presentations
- A web page template created to establish a common look and feel for a website
- An official agency form that must be completed by employees or members of the public

www.ada.gov



Covered Content: Educational or Training Materials

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- Interactive or self-paced online training courses
- Educational webinars
- Support materials for educational activities, electronic worksheets, training manuals, or tests

www.ada.gov



Covered Content: Notice of Benefits, Program Eligibility, Employment Opportunity, or Personnel Action

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- A notice of government benefits
- A notice of program eligibility
- Notification of a personnel action indicating a promotion, adverse action, or other decision affecting a government employee



Not covered content ↑

www.ada.gov



Case Law



US vs. AICPA, April 2019

- Ms. Doe sued the **American Institute of CPAs** & the **National Association of State Boards of Accountancy** (NASBA) for discriminating on the basis of disability in failing to provide necessary testing accommodations for individuals who are blind or have low vision in their provision of the Uniform Certified Public Accountant Exam (the Exam).
- The ADA (Title III) requires that any private entity offering such an examination must select and administer the examination so as to best ensure that, when the examination is administered to an individual with a disability that impairs sensory, manual, or speaking skills, the examination results accurately reflect the individual's **aptitude** or achievement, rather than the individual's disability.

www.ada.gov



US vs. AICPA, April 2019

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- Settlement: AICPA agrees to pay \$15,000 to Jane Doe
 - US has 6 months to identify other “aggrieved” persons who will get \$1 - \$10,000 each
 - If you offer exams—make sure they are administered in such a way that they determine participants’ APTITUDES
 - Exams can’t effectively assess an individual’s abilities when not accommodating disabilities
- www.ada.gov



US vs. City of Colorado Springs, July 2008

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- Mr. Lazoff alleged that the City violated the ADA's non-retaliation prohibition, when the City failed to promote Lance Lazoff to Sergeant in retaliation b/c an ADA claim that his wife — a former police officer with the Colorado Springs Police Department ("CSPD") — brought against the City and/or for his participation and assistance with that action.
- Investigated by the **EEOC** for Title I discrimination, who found “reasonable cause”

www.ada.gov



US vs. City of Colorado Springs, July 2008

- Consent Decree: The City **will** promote Mr. Lazoff to Sergeant upon the first available opening.
- He will be issued backpay as a Sergeant for time worked, totaling **\$35,000**
- The City will make retro-active pension contributions (**4** years)
- He will receive job bidding seniority immediately

www.ada.gov



US vs. City of Vero Beach, Feb 2015

- This Settlement Agreement (“Agreement”) resolves an **investigation and compliance review** conducted by the United States of the City under **Title I** of the ADA
- The United States alleges that the City has engaged in a pattern or practice of discrimination under the ADA by requiring applicants to disclose disabilities in their applications prior to making a conditional offer of employment
- The City agrees that it will not conduct any medical examination or make any disability-related inquiry of a job applicant before an offer of employment has been made to the job applicant.
- The City agrees to document and show either that the reasons for the exclusion are job-related and consistent with business necessity and the job cannot be performed with reasonable accommodation, or that the individual is being excluded to avoid a “direct threat” to health or safety

www.ada.gov



GIL vs Winn-Dixie, June 2017

- The Plaintiff prevailed on his claim that Winn-Dixie has violated the ADA (Title III) because the inaccessibility of its website has denied him the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations that Winn-Dixie offers to its sighted Customers
- Winn-Dixie agreed to pay \$105,271.06 in fees and costs

Case 1:16-cv-23020-RNS



US vs Thomas Jefferson Hospitals

- ADA complaint was filed with DOJ; Attorney General investigated claim/initiated civil action under Title III
- Confirmed: complainant, who has cerebral palsy, osteoporosis, and uses a wheelchair was denied equal access to services based on disability
- Settlement: pay complainant **\$5,000** within 14 days
- Jefferson Hospital will adopt non-discriminatory policy/post to website
- Jefferson Hospital will train current staff on ADA/Title III, and all new hires henceforth

www.ada.gov



US vs City of Minneapolis

- Complainant was interviewed for police officer position with the city. Oral interviews and subsequent physicals passed—job was offered.
- Complainant received a conditional offer of employment from Defendant, after having passed the physical fitness exam, an oral interview, and background investigation, and after having been selected by Police Department management
- After accepting conditional offer, psychiatric examination was done; results determined applicant was not “psychiatrically fit” for the job due to “...history of PTSD...” *no specific justifications

www.ada.gov



US vs City of Minneapolis

- Complainant soon thereafter hired by neighboring City of Anoka in 2016, quickly promoted to S.W.A.T.
- Minneapolis did not hire, *solely based on a disability—wrong call
- Ordered to pay \$189,338.89 in back pay/damages
- City will adopt non-discriminatory policies, post them, train employees on ADA/Title I...

www.ada.gov



US vs Greyhound

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- Greyhound paid over \$3,000,000 for:
- Failure to provide accessibility features like lifts/securement devices
- Failure to provide disabled patrons boarding assistance
- Failure to allow patrons with wheelchairs to complete reservations online
- Paid an additional \$75,000 civil penalties to US gov't
- US mandated systemic reforms, including hiring ADA Coordinator, annual ADA training to employees, and quarterly reporting to DOJ on compliance efforts

www.justice.gov



EEOC vs Corizon Health

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- EEOC charged Corizon Health for:
- Refusing to accommodate disabled employees w/ exhausted leave per “30 day policy” & terminating them
- Failing to consider reassignment, unpaid leave, modified schedules that would allow return to work
- Requiring disabled employees to be “100% healed” before return to work
- Corizon refused to settle
- Corizon will pay \$950,000 to 23 individuals identified
- Corizon will modify their policies and practices and designate ADA coaches
- Corizon will provide annual training & hire a monitor to ensure ADA compliance

www.eeoc.gov



US vs City of Dekalb, IL and Others...

- DOJ investigated hiring practices, found multiple violations re: Title I
- City has engaged in a pattern or practice of discrimination under the ADA by requiring applicants to disclose disabilities in their applications *prior* to making a conditional offer of employment
- The city's employment opportunities website and job applications therein were found to be inaccessible
- Settlement includes required ADA training/reporting, adopting improved HR processes (medical information disclosure/conditional offers of employment) and ensuring their website/all related content meets WCAG 2.0 criteria

www.ada.gov



Aleeha Dudley & US vs. Miami University

- Miami University failed to ensure that individuals with disabilities can interact with Miami University's websites and access course assignments, textbooks, and other materials on an equal basis with students who do not have disabilities.
- Consent Decree: Miami will make significant improvements to ensure that technologies across all its campuses are accessible to individuals with disabilities and will pay \$25,000 to compensate individuals with disabilities. (including current & former students)

www.ada.gov



US Vs FDOC

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- Failure to provide assistive devices/auxiliary aids required to perform routine activities in prison environment
- Failure to provide interpreters
- Failure to provide TTY or videophones (required for legal/family visits)
- Exclusion from programs/services
- FDOC ordered to provide ADA training to staff,
- Take affirmative steps as necessary to restore each aggrieved person
- Pay compensatory damages for pain and suffering in appropriate amount for injuries suffered

www.ada.gov



Gomez, Haynes vs. Hooters

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- 2016: Blind user, Gomez, sued Hooters because their website was inaccessible (not compatible with his screen reader)
- 3 weeks = settlement: Hooters will place an accessibility statement w/in 6 months
- Hooters will improve access within 12 months, conforming with WCAG 2.0
- 2017: Blind user, Haynes sued Hooters for identical reasons. Moot case?
- District court granted Hooters claim of mootness—already remediating per their agreement
- APPEAL ► court found Haynes' claim **NOT MOOT**—Hooters' assurance to an unrelated party to remediate its website does not moot Haynes' claim.
- The point? A private settlement agreement will not moot a new claim by a new plaintiff. Only **remediation** will do that.



Resources on Accessible Documents

- [Section508.gov/create/documents](http://section508.gov/create/documents)
 - Guidance developed by the Accessible Electronic Documents Community of Practice (AED COP)
- Microsoft Word Training Video
 - 13 parts, most segments 2-4 minutes
 - Section on tables is 15 minutes
- Checklists and Guides!
 - Checklist is two pages
 - Guide is 22 pages; plain language and illustrations
- Also resources for PDF and PowerPoint
 - <http://section508.gov/create/pdfs>
 - <http://section508.gov/create/presentations>
 - <http://section508.gov/create/spreadsheets>



More Resource on Accessible Documents

- Adobe (including Acrobat)
 - www.adobe.com/accessibility/products.html
- Microsoft
 - www.microsoft.com/en-us/accessibility/office
- WebAIM
 - <http://webaim.org/techniques/word>
- Accessible Digital Office Document (ADOD) Project
 - <http://adod.idrc.ocadu.ca>



Thank you for listening.

Josh Jenkins
ADA/Safety Coordinator
Martin County BOCC
772-320-3175
Jjenkins@martin.fl.us
www.martin.fl.us



Evaluating Websites for Accessibility



Overview of How People with Disabilities Use the Web



How do People with Disabilities Use the Web?

- How do people use the web?
 - Windows, Mac, mobile phone
 - Web browser of choice, e.g.:
 - Chrome
 - Firefox
 - Internet Explorer
 - Safari
 - Edge
- Same for people with disabilities!



How People with Disabilities Use the Web

- Platform of choice (i.e., a mainstream web browser)
 - Most people with disabilities use hardware and software “as-is”
 - Some PWD customize settings
 - Some people with disabilities also use “assistive technology”
 - E.g., “Screen reading” software adds speech output
- For more and better examples:
 - www.w3.org/wai/people-use-web
 - www.w3.org/wai/fundamentals/accessibility-intro



Question 4

ADA accessibility issues do not apply to use of smart phones?

- a) True
- b) False



Accessibility of *platforms* is very good!

- Microsoft Windows
- Apple (OS X, iOS)
- Google Android
- On Desktop:
 - OS and web browsers work well using only the keyboard
- On Mobile:
 - Platform web browser works well with phone's accessibility features



So what is the problem?

- Hardware has good accessibility
- OS has good accessibility
- Web browsers (the software) have good accessibility



Content is the problem!

- The author of the web page mostly controls the accessibility
- Example: If the author adds a meaningful and informational graphic or image
 - Author needs to add description identification or text equivalent



Why we are talking about 508?



Web accessibility is not new!

- Trace Center initiated “Unified Web Site Accessibility Guidelines”
 - Central Reference Document, June 1997, version 7.2
- Web Content Accessibility Guidelines 1.0
 - W3C Recommendation, May 1999
 - www.w3.org/tr/wcag10
- Original Section 508 Standards, December 2000
 - 1194.22 Web-based intranet and internet information and applications
 - www.federalregister.gov/d/00-32017



Standards Refresh

- Web Content Accessibility Guidelines 2.0
 - W3C Recommendation, December 2008
 - www.w3.org/tr/wcag20
- U.S. Access Board
 - Revised Section 508 Standards, January 2017
 - Phrase we have been using is “ICT Refresh”
 - www.access-board.gov/508
- W3C work continues (does not effect 508)
 - WCAG 2.1 W3C Recommendation, June 2018
 - www.w3.org/tr/wcag21



Are non-federal websites required to comply with Revised 508 Standards?

- Section 508 applies only to federal agencies when they procure, use, develop, or maintain ICT
 - Section 508 itself does not apply beyond the federal government
- In some cases, compliance with the 508 Standards may be required by other rules and regulations
- The 508 Standards can serve as useful guidance for other entities in providing access



Question 5

ADA accessibility website issues have just come to the forefront in the last couple of years?

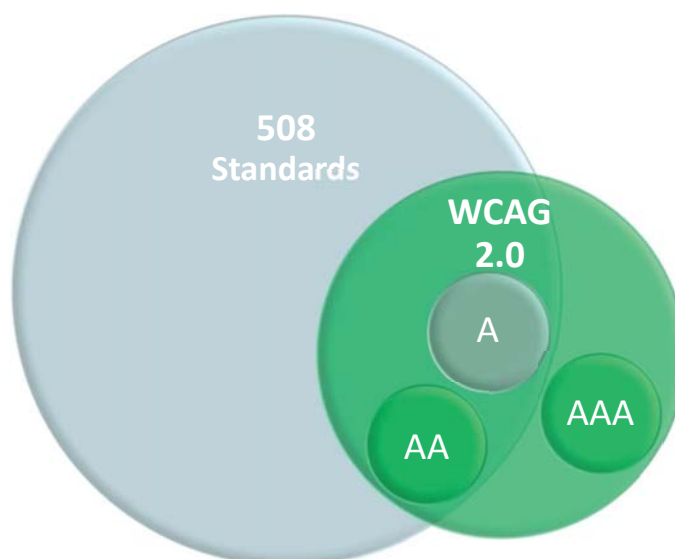
- a) True
- b) False



Why we are talking about WCAG?



Revised 508 Incorporation By Reference (IBR) of WCAG 2.0





Revised 508 Standards: Broad Application of WCAG 2.0

WCAG 2.0 Level A and AA Success Criteria
and Conformance Requirements applied to:

- Web content (e.g. online instructional materials)
- Covered non-Web documents (e.g. instructional materials)
- Software user interfaces (e.g. learning management systems)



WCAG 2.0: An International Standard

- WCAG 2.0 background and development
 - Represents an international, multi-stakeholder consensus
 - Adopted or referenced by many countries and organizations
 - Endorsed by International Standards Organization
 - ISO/IEC 40500:2012
- Standards harmonization advances accessibility



WCAG ToC is a Top 10 12 List!

- Provide **text alternatives** for non-text content
- Provide **captions and other alternatives** for multimedia
- Create content that can be **presented in different ways**, including by assistive technologies, without losing meaning
- Make it easier for users to **see and hear content**
- Make all functionality available from a **keyboard**
- Give users **enough time** to read and use content...

Source:

- www.w3.org/tr/wcag20/#contents



WCAG Top 12 Cont.

...

- **Avoid content that causes seizures** or physical reactions
- Help users **navigate and find content**
- Make text **readable and understandable**
- Make content appear and operate in **predictable** ways
- Help users **avoid and correct mistakes**
- Maximize **compatibility** with current and future user tools

Source:

- www.w3.org/wai/standards-guidelines/wcag/glance



Getting Started Using WCAG 2.0

- W3C Web Accessibility Initiative (WAI) homepage:
 - www.w3.org/wai
- Recommend the WCAG 2.0 Overview:
 - www.w3.org/wai/standards-guidelines/wcag
- The standard is written to be a good starting point:
 - WCAG 2.0 introduction and [layers of guidance](#):
 - Principles, guidelines, success criteria, techniques
 - Each success criterion has contextual links for “Understanding” and “How to Meet”



WCAG Features

- WCAG 2.0 success criteria (SC) are written as testable statements that are not technology-specific
- Each SC assigned a Level: A, AA, AAA
 - Revised 508 adopted Level AA (which includes Level A SC)
- WCAG structures provide built-in prioritization plan:
 - Four SC associated with CR5 for Non-Interference
 - Other Level A SC
 - Then the AA SC
 - Address AAA SC as resources allow



WCAG Organization

- SC organized in four categories (“principles”):
 - Perceivable
 - Operable
 - Understandable
 - Robust
- SC numbering comes from those four principles
 - One or more “guidelines” under each principle
 - One or more SC under each guideline



WCAG 2.0 Conformance

- Satisfy all success criteria at a given level
- Not applicable success criteria satisfied by default
- Conformance applies to entire page
- Some SC apply to multi-page processes
- Conformance at AA, or even AAA, does not mean 100% accessibility!



How can I tell if my website has accessibility issues?



Triage Website Accessibility

- Easy Checks First
 - www.w3.org/wai/test-evaluate/preliminary
- Quick Reference: Testing Web Content for Accessibility
 - www.webaim.org/resources/evalquickref
- WCAG Conformance Requirement for Non-Interference
 - www.w3.org/tr/wcag20/#cc5
- Machine Testing (a.k.a Scanning Tools)



WCAG CR 5 for Non-Interference

- WCAG CR 5 for Non-Interference
 - 1.4.2 Audio Control
 - Is there sound or music that plays automatically?
 - 2.1.2 No Keyboard Trap
 - Can you tab through the page and back to the beginning?
 - 2.2.2 Pause, Stop, Hide
 - Be careful with any animation or automatic movement!
 - 2.3.1 Three Flashes or Below Threshold
 - Any non-trivial blinking or flashing?



Other Easy Checks

- Poor contrast between text foreground and background
- Missing and bad text alternative (“alt text”) for images and graphics
- Improper heading structure (or none at all)
- Loss of meaning when screen magnified (at least up to 200%)
- Lack of form input labels
- Ambiguous links, redundant links, and empty links



Machine Testing (free examples)

- Functional Accessibility Evaluator (FAE) from University of Illinois
 - <http://fae.disability.illinois.edu>
- WAVE Web Accessibility Evaluation Tool from WebAIM (Web Accessibility In Mind)
 - <http://wave.webaim.org>
- ANDI (Accessible Name and Description Inspector) from SSA
 - www.ssa.gov/accessibility/andi



If my site has issues,
what do I do?



Number One Strategy: Be Proactive!

- Need commitment from leadership
- Designation of responsible individual(s)
- Make plans:
 - Assess
 - Remediate
 - Maintain
- Obtain necessary expertise
- Provide interim alternative access and services



Remediating Your Website

- Accessibility is inexpensive if addressed in planning stage
- Develop a priorities remediation plan
 - Most visited pages?
 - Key services?
 - Can you address many pages with single template?
 - What issues have users raised?
- Develop maintenance plan



Consider Third-Party Services

- What do you do for security, privacy, copyright?
 - Accessibility expertise can be developed in-house
- Numerous accessibility products, consultants, and firms available
 - Get a few quotes
- There is no formal credentialing
- W3C WAI offers guidance on selecting web accessibility evaluation tools
 - www.w3.org/wai/test-evaluate/tools/selecting



Question 6

Which of the following actions would be prudent for a government to take?

- a) Consult with your insurance provider and legal counsel on coverages and risk limitation.
- b) Develop risk management policies and procedures
- c) Train content creators on accessibility standards for website and document protection
- d) All of the above



ADA & Websites

Department of Justice

800-514-0301 (voice)

800-514-0383 (TTY)

www.ada.gov



U.S. Access Board

800-872-2253 (voice)

800-993-2822 (TTY)

www.access-board.gov

508@access-board.gov