



POLICY NAME: Town of Oakland, Website Accessibility Policy

APPROVAL AUTHORITY: Town of Oakland Commission

ADOPTED: January 8, 2019

RESPONSIBLE EXECUTIVE: Elise Hui, Administrative Services Manager

RESPONSIBLE OFFICE: Administrative Services

CONTACT: Elise Hui, Administrative Services Manager
407-656-1117

I. POLICY STATEMENT

The Town of Oakland Website Accessibility Policy establishes guidelines for website accessibility.

II. PURPOSE

The purpose of this policy is to establish guidelines for website accessibility and to ensure compliance with state and federal laws regarding equal access to websites and content for individuals with disabilities and to ensure that the Town's internal and external websites meet the Web Content Accessibility Guidelines (WCAG) version 2.0 level A and AA and WCAG version 2.1, published by the World Wide Web Consortium (W3C). This applies to all departments who provide services to the public via the website or other digital means.

Title I of the Americans with Disabilities Act (ADA) prohibits employers from discriminating against qualified individuals with disabilities in all stages of employment, including job application procedures. The Town must ensure that its employment opportunities, website, and job applications contained therein, conform to accessibility standards.

Title II of the ADA requires that the Town of Oakland provide individuals with disabilities equal access to programs, services, or activities. Equal access means providing the same information and functionality, delivered in the same time frame, with substantially equivalent ease of use.

The Town seeks to deploy information technology that has been designed, developed, or procured to ensure the Town's internal and external websites are accessible to people with disabilities, including those who use assistive technology.

III. BACKGROUND

The Americans with Disabilities Act (ADA) and the 1998 amendment to the Rehabilitation Act of 1973 (Section 508) require that government websites eliminate accessibility barriers in information technology and encourage development of technologies that will help achieve these goals. Under Section 508, agencies must give individuals with disabilities access to information that is comparable to the access available to others.



IV. POLICY SCOPE

This policy applies to all websites, internal and external, maintained by the Town of Oakland.

This policy also promotes accessible websites for the Town of Oakland to help ensure that as broad a population as possible may access, benefit from, and contribute to the Town's programs, services and activities information.

The policy and its requirements are structured to give departments the flexibility to develop and support a website accessibility program that reflects local needs and resources.

Website accessibility is not a one-time Town effort but must be incorporated into every website activity on an ongoing basis. Departments need to prioritize website accessibility efforts and continually work toward achieving a more accessible website.

V. DEFINITIONS

Website Accessibility: A best practice to make sure that the makeup of a website (source code/interface/content) is configured in a way so that those with disabilities can navigate the website like anyone else without any virtual barriers. They do this utilizing different types of assistive technologies, such as screen reading software for those who are visually impaired which allows them to listen to the website. Therefore, code/content needs to be tagged appropriately so that everything can be described through a screen reader.

National and International Standards for Website ADA Compliance

- A. ADA Title II:** A regulation that prohibits discrimination against people with disabilities by public entities – state or local government and any of their departments, agencies, or other instrumentalities.
- B. Section 504 of the 1973 Rehabilitation Act:** (which requires access to programs and activities that are funded by federal agencies to federal employment) prohibits discrimination against people with disabilities in federal entities, or programs that receive federal financial assistance, and set the stage for enactment of the Americans with Disabilities Act. Section 504 protects children and adults with disabilities from exclusion and unequal treatment.
- C. Section 508 of the 1973 Rehabilitation Act:** Requires federal agencies to make their electronic and information technology accessible to people with disabilities.
- D. Web Content Accessibility Guidelines (WCAG) 2.0 Checkpoints:** Require a balance between automated testing (AudioEye engineers, Acrobat Accessibility Checker, Word, etc...) and manual testing (skilled testers using different assistive technologies across different operating systems and browsers are required to conduct this process).



VI. POLICY

- A. The Town is committed to providing the public, including individuals who use assistive technology, access to web-based information and services by using the Web Content Accessibility Guidelines (WCAG) version 2.0 level AA and WCAG version 2.1, published by the World Wide Web Consortium (W3C).
- B. The Town is subject to and must comply with both Title I and Title II of the ADA and Section 508 of the Rehabilitation Act. To the extent that there are inconsistencies between Title II and Section 508 regarding website compliance, town departments will attempt to comply with the more stringent standards between the two.
 1. The Town and its departments are responsible for ensuring that all information posted to its websites, both internal and external, comply with accessibility standards, or that it makes provisions to supply the material in an alternate format.
 2. If the Town contracts to develop, maintain, or host websites, the Town will require that contractor meets accessibility standards and that accessibility standards are addressed within the contract.
- C. Given the rapid pace of technological change, this policy does not stipulate a specific set of design principles but strives to ensure that the Town appropriately utilizes new technology when needed to provide access to website content through assistive technologies by utilizing the "Town of Oakland Web Standards and Style Guide" (hereafter referred to as the "Standards"). Departments are responsible for ensuring that staff and contractors that develop or publish materials to the Town website are familiar with these Standards. The Administrative Services Division has developed and will periodically review and update the Standards.
- D. All new Town websites created after the effective date of this Policy will comply with this policy.
- E. The existing website will be brought into compliance with this Policy as part of any substantive site additions, updates or redesign.
 1. Substantive changes include significant changes to navigation structure, redesign of site 'look and feel' and addition of new content areas, programs or services.
 2. Priority for implementing accessibility standards should be given to services that require or make available to the public on-line forms, services most frequently accessed and related information such as: major policy documents and reports, forms, materials associated with public meetings and human resources information.



VII. PROCEDURES

- A. **Contracted Services.** When procuring or contracting for public facing content the contractor must provide deliverables that are accessible and usable with assistive technologies. The deliverables must conform to accessibility standards.
1. During the procurement process, potential contractors or vendors of information technology products are required to submit a Voluntary Product Accessibility Template (VPAT) 2.0, or the most recent VPAT version.
 2. Utilizing VPAT 2.0, or the most recent VPAT version, Town staff must determine the product/service that most conforms to accessibility standards and best meets the business need.
 3. Prior to initiating a contract for information technology products/services, accessibility testing must be conducted (see B. Accessibility Testing.)
 4. Prior to renewing a contract for information technology products/services with existing vendors, the vendor must submit a completed VPAT 2.0, or the most recent VPAT version, and timeline for remediation of existing barriers to access in their product.
- B. **Accessibility Testing.** The Town staff will assess all proposed online services before they are made available to the public for conformance with, at minimum WCAG 2.0 AA and WCAG version 2.1 by:
1. Performing automated accessibility tests, using an automated tool to identify any accessibility barriers; and
 2. Enlisting individuals with different disabilities, including at a minimum individuals who are blind, deaf, and have physical disabilities (such as those limiting the ability to use a mouse) to test for ease of use and accessibility barriers.
- C. **Training.** Individuals responsible for maintaining and updating the website shall have a working knowledge of accessibility requirements. To that end, identified staff is required to annually participate in a minimum of two hours continuing education and training related to website accessibility.
- D. **PDF Accessibility.** Documents containing text posted on the Town's website will, to the greatest extent possible, be accessible PDFs or in another alternate accessible format. Consultants providing plans and other documents for public use must provide accessible formats.
- E. **Accessible Videos and Multimedia Content.** New videos and multimedia content that are produced by the Town will have captioning and audio descriptions. When distributing videos and multimedia content from outside sources, every effort should be made to ensure that accessible content is used.



- F. **Social Media.** Information posted to social media sites must be done in a manner that allows members of the public with disabilities to access information that is comparable to information provided to persons without disabilities. Images posted to social media sites will have alternative text or be accompanied by descriptions that convey the content of the image. When posting videos every effort should be made to ensure that the videos have captioning and/or audio descriptions.
- G. **Alternative Means.** Where information technology that fully conforms to the applicable standards is not commercially available, the Town shall provide individuals with disabilities access to and use of services by an alternative means that provides substantially equivalent level of access and ease of use.
- H. **Exceptions.** When information technology conforming to the applicable standards is not commercially available, it may be necessary for the Town to acquire and utilize information technology that in its current state hinders full access and/or equivalent ease of use for persons with disabilities. The Town has an obligation to procure the product that best meets the standards and is consistent with the business need for the information technology. The Town is not required to procure information technology that is not needed to perform the intended task.

In such instances, the department(s) wishing to utilize the non-conforming information technology shall request in writing to the Administrative Services Manager for approval of an exception. The exception request shall be accompanied by a temporary accommodation plan that outlines how the department(s) will provide alternative means until the information technology can be made accessible. The accommodation plan should be established in consultation with the Town Administrative Services Manager.

The request for exception must include:

- Rationale for the exception request, including a discussion of why no accessible alternative could meet business need;
- Documentation of accessibility issues with the produce or services; and
- A temporary accommodation plan.

The temporary accommodation plan must:

- Provide an equivalent level of access and ease of use for individuals with disabilities;
- List the parties responsible for implementation and oversight;
- Outline how the existence of the accommodation will be communicated to users;



- Include a timeline for remediation of current barriers with the product or service such as accessibility improvements/upgrades/patches); and
- Indicate what is being done to ensure that the product or service will become accessible (interaction with vendor/developers, detailed feedback from the public, etc.), including provision to nullify the contract with the vendor or replace the system if remediation timeline is not satisfied.

VIII. RESPONSIBILITIES

- A. Town departments are responsible for implementing this policy.
- B. Town web page content providers and document authors are responsible for ensuring Town website content complies with this policy.
- C. The Administrative Services Manager is responsible for developing and maintaining the “Town of Oakland Web Standards and Guidelines” (Standards).
- D. The Administrative Services Manager is responsible for administering this policy and for resolving any grievances related to this policy.

IX. RESOURCES

A. Civic Plus

- I. [Help Center Accessibility Section](#)
- II. [ADA Checker](#) (within the Editor Widget)
- III. [How to properly upload a document](#)
- IV. [ADA Section 508: Everything You Need to Know Webinar](#)
- V. [2018 Global Accessibility Awareness Day](#)

B. Audio Eye

- I. CivicPlus utilizes a third party called [AudioEye](#) which optimizes websites for digital accessibility. Free scans can be performed to check all headings, text, widgets, etc... to determine if there are any ADA compliance issues. Below are the definitions for terms listed in an AudioEye report:
 - I. **Errors:** elements that simply do not adhere to accessibility standards.
 - II. **Risks:** detectable patterns that can lead up to an error. Risks require manual observation to determine if these elements meet standards. Risks should be observed by skilled tester with a high level of expertise in the use of assistive technology and in-depth knowledge of WCAG 2.0 testing techniques.



C. Government

- I. [ADA Government Site](#)
- II. [United States Access Board](#)
- III. [Web Content Accessibility Guidelines \(WCAG\) 2.1](#)
- IV. [Section 508 IT Accessibility Program](#)

D. Third-Party

- I. ["AChecker" Accessibility Checker](#)
- II. [GoogleVox](#) (free Google Chrome Web Browser Extension)
- III. [Adobe](#)
- IV. [Microsoft](#)
- V. ["ADA Compliance, Creating an Accessible PDF"](#) YouTube video | Fayetteville Technical Community College YouTube Channel

X. EXHIBITS

A. Town of Oakland, FL Website Accessibility Statement Language

Using this Site

Welcome to the Town of Oakland website. At this time, the town is incorporating into our website the Web Page Disability Access Design Standards developed by the Office of Equality Assurance. We are pleased to provide an alternative medium for accessing information about our programs and services. To ensure you receive information in an accessible format you can get in touch with us in the following ways:

- [Submit a form](#) to request Americans with Disabilities Act (ADA)-accessible information. Please note: This form is *not* for requesting documents pursuant to the Florida Public Records Act.
- Contact us by phone at 407-656-1117. Users who need accessibility assistance can also contact us by phone through the Federal Information Relay Service at 1-800-877-8339 for TTY/Voice communication.
- If you have any suggestions for improving the accessibility features of our website, please email ehui@oaklandfl.gov.

To enable us to respond in a manner most helpful to you, please indicate the nature of your accessibility problem, the preferred format in which to receive the material, the Web address of the requested material, and your contact information.

Accessibility Design Guidelines

Our website has been designed with the following accessibility guidelines in mind:

- The standard font used throughout the site has been chosen to be easily legible.
- Wherever possible, we use live text instead of graphics to reduce the download time of pages and increase your control.



- No information is exclusively conveyed using color. This doesn't mean that colors are not used to organize information; instead it means there are also other, non-color dependent ways of doing this.
- All images and hyperlinks, where appropriate, have an alternative text attribute. This means when an image or hyperlink is conveying important information its content is described with an alternative text.
- We work to comply with [Section 508](#) as well as [2.0 A and AA](#) referring to website accessibility standards.
- If you have difficulty accessing the site or have any comments or feedback, please do not hesitate to [contact us](#).

ADA Policies and Procedures

- [Web Standards and Style Guide](#)
- [Town of Oakland's ADA policy](#)
- [ADA grievance procedure](#)

Forms

- Request [ADA-accessible information](#) (Note: This for is *not* for requests made pursuant to the Florida Public Records Act)
- [ADA complaint form](#)
- General questions or comments [about the town's website](#)

Browser Accessibility Information

Many popular browsers contain built-in accessibility tools.

- [Internet Explorer Accessibility Information](#)
- [Firefox Accessibility Information](#)
- [Chrome Accessibility Information](#)

PDF Reader

PDF reader software is required to view and print PDF documents that appear on this website. We recommend Adobe's free PDF Reader software.

- To download this program for free, visit the [Adobe website](#).
- To read PDF documents with a screen reader please visit the [Adobe Reader Accessibility website](#) that provides useful tools and resources.

Flash Player

Flash player software is required to view the video content on this site. We recommend Adobe's free Flash Player software.

- To download this program for free, visit the [Adobe website](#).
- To access flash content using a screen reader please visit the [Adobe Flash Player Accessibility website](#) that provides useful tools and resources.



Supported Assistive Technology

- Latest version of JAWS for Windows
- Latest version of NVDA for Windows
- Latest Version of VoiceOver for Mac OS X
- Keyboard-Only Navigation