



**TOWN OF MT. CRESTED BUTTE
ACCESSIBILITY TRANSITION PLAN AND
ADA ONLINE ACCESSIBILITY POLICY**

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Town of Mt. Crested Butte Web Accessibility Transition Plan

Introduction

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability in places of public accommodation. The Department of Justice (DOJ), which enforces the ADA, has interpreted this to include access to online technology.



The Town of Mt. Crested Butte (Town) is committed to online accessibility for all citizens and has prepared this transition plan (Plan) to identify online barriers to accessibility and opportunities to remove those barriers for people with disabilities through policy modification and training. The Plan assists with a long-term strategic approach to continue improvements to the accessibility of the Town's website.

This document summarizes the Town's web accessibility ADA self-evaluation, transition plan, and ongoing management plan. It includes:

- An overview of the Federal online accessibility requirements
- Testing and prioritization methods
- A review of the Town's compliance efforts
- An overview of the Town's ADA Online Accessibility Policy

Federal Accessibility Requirements

Two major pieces of federal legislation guide the Town's policies and practices for providing equal access to online technology for people with disabilities: the Americans with Disabilities Act and Section 508 of the Rehabilitation Act.

Sections 504 and 508 of the Rehabilitation Act of 1973

In 1998, the United States Congress amended the Rehabilitation Act to require Federal agencies to make their information and communication technology (ICT) accessible to persons with disabilities. Section 508 was enacted to eliminate barriers to ICT, to make available new opportunities for persons with disabilities, and to encourage the development of technologies that will help achieve these goals. The law applies to all Federal agencies when they develop, procure, maintain, or use electronic information technology. Under Section 508 (29 U.S.C. § 794d), agencies must give employees with disabilities and members of the public access to information that is comparable to the access available to others. Section 508 does not apply to the Town since we are not a Federal agency. However, the Town is subject to Section 504 of the Rehabilitation Act as a recipient of Federal funds. Section 504 requires web accessibility similar to the web accessibility requirements under Section 508 for Federal agencies.

Americans with Disabilities Act, as amended (ADA)

Signed into law on July 26, 1990, the ADA is a federal civil rights law that prohibits discrimination against persons with disabilities in all areas of public life including employment, government programs and services, transportation, and places open to the public. Title II of the ADA requires public entities, such as the Town, to complete a self-evaluation and develop a transition plan to address any barriers persons

with disabilities may encounter in Town programs, services, activities, and facilities.

ADA regulations and corresponding guidelines issued by the US Department of Justice (DOJ) and the U.S. Access Board are the standards by which the Town measures its compliance with accessibility and non-discrimination requirements.

The Town's ADA compliance efforts are housed in the Office of Accessibility within MTCB's Marketing Communications Department and Community Development Department. Both departments are responsible for resolving ADA and Section 504 concerns and complaints involving the Town.

Assistive Technology

Assistive technology devices and services are defined in the ADA. These definitions remained unchanged until 2004 with the passage of the Individuals with Disabilities Education Improvement Act (IDEA), when an exemption to the definition of an assistive technology device was added to clarify a school's responsibility to provide surgically implanted technology such as cochlear implants.

Assistive technology devices are identified in the IDEA as:

Any item, piece of equipment or product system, whether acquired commercially off the shelf, modified, or customized, that is used to increase, maintain, or improve the functional capabilities of children with disabilities.

Assistive technology devices are available in a variety of categories to address functional capabilities of students with disabilities. These categories include but are not limited to:

- **Academic and Learning Aids:** Electronic and non-electronic aids such as calculators, spell checkers, portable word processors, and computer-based software solutions that are used by persons with disabilities.
- **Assistive Listening Devices and Environmental Aids:** Electronic and non-electronic aids such as amplification devices, screen readers, closed captioning systems, and computer technology such as Dragon.
- **Computer Access and Instruction:** Input and output devices, alternative access aids, modified or alternative keyboards, switches, special software, and other devices and software solutions that enable persons with disabilities to access information technology.

Ultimately, the objective of assistive technology is to make information, programs, services, and facilities more accessible to the user of the equipment. For example, a person who is blind may use a screen reader to access information online to apply for a job or inquire about a service. Screen reader technology works by scanning the structure of a web page, portable document (such as PDF), Word document, or software application and relaying that information to the user audibly. Another example includes closed captioning, which enables persons who are deaf or hard of hearing to access information that is being presented in sound alone.

Testing Tools and Techniques

The Town of Mt. Crested Butte's website template was built by the State of Colorado and follows all ADA Online Accessibility rules and regulations outlined by bill [HB21-1110](#). However, it is still up to the Town of Mt. Crested Butte to continuously use and incorporate a variety of tools, techniques, methods, and processes to identify accessibility barriers and meet existing and new assistive technology needs for the Town website. The following tools and techniques are not intended to represent an inclusive list,

but a shortlist of tools and processes that the Town uses in its accessibility compliance initiatives.

Internet Browsers

To ensure consideration is given to as many devices and browser types as possible, manual accessibility tests are conducted incorporating a variety of browsers, including the latest versions of Internet Explorer, Edge, Chrome, and Firefox.

Assistive Technologies

To better test browser accessibility, the following assistive technology types have been used to analyze mtcb.colorado.gov: WAVE, Colour Contrast Analyzer, JAWS, NVDA, VoiceOver, and ChromeVox.

WAVE

WAVE is a code-sniffing application that assesses the accessibility of code, including HTML, CSS, and JavaScript documents, and provides guidance and techniques to remediate accessibility issues. WAVE can be accessed using the form at <https://wave.webaim.org/> or can be downloaded as a plug-in for Firefox and Chrome.

Colour Contrast Analyzer

The Colour Contrast Analyzer is a drip tool that can be used to test color contrast accessibility. The tool includes a color-blind simulator and tests for A, AA, AAA, regular font, and large font requirements.

Screen Reader Technology

A “screen reader” is a program that enables a blind or visually impaired user to read the text that is displayed on the computer screen with a speech synthesizer or braille display. Examples include JAWS, NVDA, Window Eyez, and Voiceover.

JAWS (Screen Reader)

Since the development of screen reading technology began, Job Access with Speech (JAWS) has led to many innovations in assistive technology. JAWS is advertised as the world’s most popular screen reader, developed for computer users whose vision loss prevents them from seeing screen content or navigating with a mouse.

NVDA (Screen reader)

NVDA is a free, open-source, portable screen reader for Microsoft Windows. In 2006, Michael Curran started the project to improve access to the Web for persons who are blind. NVDA uses eSpeak as its integrated speech synthesizer. Output to braille displays is supported officially from version 0.6p3 onwards. NVDA works with software such as WordPad, Notepad, Internet Explorer, Chrome, Outlook Express, Mozilla, and other Microsoft-supported applications.

NVDA is a popular tool and offers many features that are convenient for quality assurance testing professionals, including the capability to quickly access the accessibility tree of a document by pressing INSERT + F7, which activates a pop-up window that displays all links, headings, and landmarks within a document. These navigable points within documents provide ease of use access for users of assistive technology which allows the user to skip information that is not relevant to them.

VoiceOver (Screen reader)

VoiceOver is a screen reader built into Apple Inc.’s macOS, iOS, tvOS, watchOS, and iPod operating systems. By using VoiceOver, the user can access their Macintosh or iOS device based on spoken descriptions and, in the case of Mac, the keyboard. The feature is designed to increase accessibility for

blind and low-vision users, as well as for users with dyslexia. The tool can also be used to test for mobile accessibility.

ZoomText Magnifier/Reader

ZoomText Magnifier/Reader is a fully integrated magnification and reading program tailored for low-vision users. Magnifier/Reader enlarges and enhances everything on a computer screen, echoes user typing and essential program activity, and automatically reads documents, web pages, and email.

Overview of Compliance Efforts

Since 2021, the Town has engaged in several activities as part of its ongoing ADA web accessibility compliance efforts, including, but not limited to, the following:

- **2021** – The Marketing Communications officer was hired in part to revise the Town website to improve and assess any accessibility barriers people with disabilities may face online
- **2022** - The Town website was updated with a grant from the Colorado Statewide Internet Portal Authority (SIPA). SIPA provided the town with hosting the .gov site and constantly updates the website template via Drupal. The mtcb.colorado.gov site format was provided by the state of Colorado meeting all the ADA requirements of a design template for web browsers
- **2023** – The Town completed assessments of its public-facing applications and portable documents
- **2023** – The Town designated a Web Accessibility Coordinator who is responsible for coordinating its compliance with the state legislative bill [HB21-1110](#).
- **2023** - The Office of Accessibility began reviewing new technology for accessibility
 - In its assessment efforts, the Town identified customer-facing applications and portable document types that may create barriers to online accessibility.
- **2023** – The Office of Accessibility completed its initial remediation and training work regarding external applications and portable documents.
- **2024** - The Town created and published a [Website Accessibility Statement](#). This statement reflects Mt. Crested Butte’s commitment to making its websites accessible to the widest possible audience. Website users are encouraged to provide input on accessibility issues to help improve the user experience for people with disabilities.

More information about the Town’s ADA-related policies and procedures are available online through the [Office of Accessibility webpage](#).

ADA Online Accessibility Policy

The Policy mandates that the Town will begin the remediation process of existing technology, procure accessible online technology, and coordinate training and policy modification efforts throughout staff.

More specifically, the Policy mandates:

- A Web Accessibility Coordinator be identified to comply with and coordinate remediation work associated with the Policy.
- Town content creators, department heads, identified department liaisons, and authors of public documents comply with the Policy.
- New technology procured for public use complies with the Policy.

- Audits to be scheduled annually by the Web Accessibility Coordinator to ensure continued compliance.

The Policy also establishes guidelines for the following technology to be excluded from the accessibility requirements except upon request for reasonable accommodation:

1. Archived documents,
2. Syndicated content, and
3. Portable document types that include:
 - a. Blueprints
 - b. Architectural drawings
 - c. Diagrams displaying information that is also provided in narrative text
 - d. Complex and/or atypical images and diagrams
 - e. Scanned historical publications
 - f. Handwritten correspondence
 - g. Technical drawings
 - h. Site plans, development plans, and maps
 - i. Complex and comprehensive tables and charts
 - j. Documents that contain 50 pages or more
 - k. Documents identified by the Accessibility Prioritization Committee as having no-to-low impact on users of assistive technology or documents that contain information that is available in an alternative and accessible format
 - l. Images where there is no logical methodology to create an alternate description that will make the image understandable to assistive technology, and
 - m. Portable documents created before January 1, 2018 (the date of Federal adoption of WCAG 2.0)

The Policy requires that newly developed and procured technology adhere to defined and adopted accessibility standards. The following sections of this document detail the Town's efforts to comply with the Policy.

Milestones – ADA Online Accessibility Policy

Assessments and Compliance Efforts

As required by the Policy, the Office of Accessibility conducted accessibility assessments of all known external, publicly facing information and communications technologies (ICT). This evaluation included known publicly facing websites, portable document types, user interfaces, and other communication tools such as telecommunications, video conferencing, town council meetings, and information boards.

To address these potential barriers, the Office of Accessibility worked closely with Town Department heads to develop training programs for proper document development. Such trainings, guides, and policies include but are not limited to:

- Creating Accessible Documents in Word
- Creating Accessible Documents in Excel
- Creating Accessible Documents in PowerPoint

- One-on-one training with department liaisons
- Document template development
- Creating Accessible Documents – General
- Creating Accessible PDF documents

External Applications – Assessments

The following core principles were used to evaluate the accessibility of the Town’s external-facing web applications:

Perceivable - Information and user interface components must be presentable to users in ways they can perceive. This means that users must be able to perceive the information being presented (it can't be invisible to all of their senses).

Operable - User interface components and navigation must be operable. This means that users must be able to operate the interface (the interface cannot require interaction that a user cannot perform).

Understandable - Information and the operation of user interface must be understandable. This means that users must be able to understand the information as well as the operation of the user interface (the content or operation cannot be beyond their understanding).

Robust - Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies. This means that users must be able to access the content as technologies advance (as technologies and user agents evolve, the content should remain accessible).

Audits – Continued Compliance

The Office of Accessibility continuously audits new online content and has integrated strategic objectives into this process. A high-level example of this can be demonstrated as follows:

- Department assessment needs and goals identified
- Department resources and digital content assessed
- Potential barriers are identified and remediated
- Programs, services, activities, and policies and procedures are assessed concurrently

As the Office of Accessibility works towards achieving its strategic objectives, potential accessibility barriers and resolutions to those potential barriers continue to be identified by the Marketing Communications Officer.

Disability Awareness and Inclusion Training

The Town offers the following disability- and inclusion-related training to all employees through CIRSA which include:

- Diversity in the workplace
- ADA Compliance in the workplace

Organizational Standards

Per the ADA Online Accessibility Policy, the Town has adopted WCAG 2.0 AA as its digital accessibility standard. Guides and standards have been developed for all levels of content access, including design and development, content management, content authorship, and procurement.

Testing, Remediation, and Accessibility Expertise

The Office of Accessibility has been identified as a critical stakeholder in the procurement and development of new technology. As required by the ADA Online Accessibility Policy, the Town's Marketing Communications Officer serves as the Town's web accessibility expert and tests new technology using industry standards, tools, checklists, and various assistive technologies to improve accessibility and remove potential barriers. Potential barriers are reported as needed for remedial efforts.

Use of the expertise and resources made available by the Office of Accessibility is required per the ADA Online Accessibility Policy.

Responsible Official

The Town has designated the Marketing Communications Officer to coordinate the implementation of the Town's Web Accessibility Transition Plan. This position oversees and coordinates the Town's efforts as outlined in the Plan to remove potential online barriers to access for people with disabilities. To contact the designated employee:

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