

TOWN OF BELLEAIR ADMINISTRATIVE POLICIES AND PROCEDURES MANUAL	
POLICY: Digital ADA Compliance Policy	POLICY NUMBER: XX
ORIGINATING DEPARTMENT: Administration Department (Cathy DeKarz)	
EFFECTIVE DATE: January 19, 2021	APPROVED BY:
SUPERSEDES POLICY: N/A	LAST REVISED: January, 2021

SCOPE

This policy establishes standards, expectations, and accountability measures for digital ADA compliance on Belleair’s website, social media, and other digital presences.

OBJECTIVES

1. Achieve WCAG compliance by August 29, 2021, as required by the 2019 consent decree from the Tampa Division District Court.
2. Establish compliance expectations and provide guidance for staff working on Belleair’s website and social media platforms.
3. Address the standards, needs, and challenges digital ADA compliance.

PERFORMANCE MEASURES

1. Track web page and PDF document compliance via third-party accessibility checker and maintain at least 90% compliance
2. Track PDF document compliance progress via third-party accessibility checker and maintain at least 90% compliance
3. Reduce number of claims
4. Track the number of requests for reasonable accommodation
5. Track the time between a reported deficiency and its successful resolution
6. Review this policy for any necessary adjustments at least every two versions of WCAG standard revisions

DEFINITION OF TERMS

ADA - The Americans with Disabilities Act, specifically the 2010 revision which calls for accessibility on digital platforms.

Compliance - The meeting of legal standards associated with digital accessibility, including but not limited to Section 508 of the Rehabilitation Act of 1973 (the 1998 revision), the 2010 revision of the American with Disabilities Act, current Web Content Accessibility Guide (WCAG) standards, and relevant case law.

Inappropriate Terminology - When writing or speaking about people with disabilities, it is important to put the person first. Catch-all phrases such as “the blind,” ”the deaf,” “the disabled,”

TOWN OF BELLEAIR ADMINISTRATIVE POLICIES AND PROCEDURES MANUAL	
<u>POLICY:</u> Digital ADA Compliance Policy	<u>POLICY NUMBER:</u> XX
<u>ORIGINATING DEPARTMENT:</u> Administration Department (Cathy DeKarz)	
<u>EFFECTIVE DATE:</u> January 19, 2021	<u>APPROVED BY:</u>
<u>SUPERSEDES POLICY:</u> N/A	<u>LAST REVISED:</u> January, 2021

or “handicapped” do not reflect the individuality, equality, or dignity of people with disabilities. Listed below are some recommendations for use when describing, speaking, or writing about people with disabilities.

Term no longer in use: The disabled

Term to use: People with disabilities

Term no longer in use: Wheelchair-bound

Term to use: Person who uses a wheelchair

Term no longer in use: Handicapped ramp

Term to use: Accessible ramp

Reasonable Accommodation - Per the ADA, all persons with disabilities are entitled to receive reasonable accommodation from public agencies across all functions. In the digital realm, accommodations may include providing closed captioning, sign language interpreters, or hearing devices at public meetings, allowing full website functionality from a keyboard alone, or (far more frequently) the remediation of Portable Document Format (PDF) documents on a website.

Remediation - The process of making web pages, documents, and digital tools compliant.

Screen Reader - Assistive devices that serve as a go-between for what appears visually on a computer screen and what the end-user can understand. In many ways, screen readers act as interpreters of visual elements for those with visual impairments.

Third-Party Accessibility Checker - A digital tool integrated with a website that automatically flags compliance gaps and instructs users on compliance solutions.

Third-Party Host Sites - Websites not owned or managed by the Town of Belleair that act as a proxy for hosting Town documents, ordinances, agendas, etc.

WCAG - The Web Content Accessibility Guidelines established by the World Wide Web Consortium (W3C) Web Accessibility Initiative and adopted as standards for ADA compliance.

POLICY GUIDELINES

Compliance Standards

1. The Town of Belleair shall comply with the 2010 revision of the Americans with Disabilities Act, the most currently-adopted WCAG standards, and any other laws governing digital accessibility.
2. For accommodating visual impairments, the Town of Belleair shall follow all WCAG AA standards for text readability, reading order, alternate text, color contrast, PDF tagging, and other associated categories.
 - a. One exception to providing alternate text is in regard to active images. Here, the Town defines active images as images acting as links that, once clicked on, open a compliant PDF document or HTML page. For these active images, alternate text can be written to describe the intent of the link rather than the content of the image.

TOWN OF BELLEAIR ADMINISTRATIVE POLICIES AND PROCEDURES MANUAL	
<u>POLICY:</u> Digital ADA Compliance Policy	<u>POLICY NUMBER:</u> XX
<u>ORIGINATING DEPARTMENT:</u> Administration Department (Cathy DeKarz)	
<u>EFFECTIVE DATE:</u> January 19, 2021	<u>APPROVED BY:</u>
<u>SUPERSEDES POLICY:</u> N/A	<u>LAST REVISED:</u> January, 2021

3. For accommodating auditory impairments, the Town of Belleair shall follow all WCAG AA standards for closed captioning and other associated categories.
 - a. Closed captioning: Video and audio streams produced by the Town of Belleair shall include closed captions through the following actions.
 - i. Add closed captions to all website and social media videos prior to their upload.
 - ii. Retroactively add captions to existing Town of Belleair videos, where appropriate.
 - iii. Partner with a third-party closed captioning service to live-caption all streamed public meetings and export transcripts following a public meeting.
4. For accommodating mobility impairments, the Town of Belleair shall follow all WCAG AA standards by working closely with website providers and a third-party accessibility checker to ensure adequate keyboard functions are built into the website.

Affected Media Platforms and Action Plans

1. Town of Belleair website: Belleair’s website and its content shall be accessible for persons of all abilities.
 - a. Use a third-party accessibility checker to review and correct any compliance deficiencies in regard to alternate text, heading levels, and other WCAG requirements.
2. PDF documents: Documents hosted directly on the Town’s website shall be uploaded as fully compliant PDF (or HTML, if necessary) files.
 - a. Remediate and replace any PDF documents that are not compliant
 - b. Actively enforce the compliance of new PDFs
 - c. Select documents expected from contractors shall be contractually required to be provided in a compliant format. If required, all bidders shall be notified of this requirement in the solicitation documents.
3. Online forms: All online forms connected to Belleair’s website must exist in a fully compliant HTML format.
 - a. Source and select vendors that can provide compliant online forms
 - b. Migrate non-compliant forms to compliant tools

TOWN OF BELLEAIR ADMINISTRATIVE POLICIES AND PROCEDURES MANUAL	
<u>POLICY:</u> Digital ADA Compliance Policy	<u>POLICY NUMBER:</u> XX
<u>ORIGINATING DEPARTMENT:</u> Administration Department (Cathy DeKarz)	
<u>EFFECTIVE DATE:</u> January 19, 2021	<u>APPROVED BY:</u>
<u>SUPERSEDES POLICY:</u> N/A	<u>LAST REVISED:</u> January, 2021

- c. If any current vendors do not provide compliant forms, seek contract adjustments that create a schedule for compliance or seek or new vendors that can provide enhanced accessibility
- 4. Third-party host sites: Third-party host sites have two distinct areas of compliance: the host websites themselves and the content uploaded to the host sites.
 - a. Host websites
 - i. Work with vendors to meet accessibility standards for HTML websites
 - ii. If any current vendors do not provide compliant web pages, seek contract adjustments that create a schedule for compliance or seek new vendors that can provide enhanced accessibility
 - b. Content uploaded to host websites
 - i. Seek ways to reduce unnecessary, noncompliant content inside of PDF uploads
 - ii. **Consider options - this section requires further discussion**
- 5. Social media: Content uploaded to social media platforms by users must be compliant.
 - a. All images and videos uploaded to social media shall include proper alternate text and/or closed captions.
 - b. All images with text must meet WCAG color contrast requirements.

Staff Training and Accountability

- 1. The following positions shall require specific digital ADA compliance training are below.
 - a. Director of Support Services
 - b. Town Clerk
 - c. Management Analyst
 - d. Special Events Coordinator
 - e. Recreation Programmer
 - f. Recreation Customer Service Clerk
 - g. Any other positions designated by the Town Manager
- 2. The above-listed positions shall receive training on how to comply with WCAG standards, how to remediate PDFs to WCAG standards, and how to use selected third-party checkers and tools.

TOWN OF BELLEAIR ADMINISTRATIVE POLICIES AND PROCEDURES MANUAL

POLICY: Digital ADA Compliance Policy

POLICY NUMBER: XX

ORIGINATING DEPARTMENT: Administration Department (Cathy DeKarz)

EFFECTIVE DATE: January 19, 2021

APPROVED BY:

SUPERSEDES POLICY: N/A

LAST REVISED: January, 2021

3. All employees granted permissions to edit the Town’s website and/or social media accounts must understand WCAG compliance and shall not upload any content directly to the site or a social media page that is non-compliant.
4. The Town Manager may designate one or more individuals to oversee the remediation process. This individual(s) shall administer third-party accessibility checkers and have oversight over website and social media compliance throughout the organization.

Compliance Schedule

1. Using the guidelines of this policy, applicable laws, standards, and regulations, and feedback from the Town Commission, staff will create and execute a Digital ADA Transition Plan to achieve compliance by August 29, 2021.
2. The resulting plan shall include specific compliance timelines and goals for the tools and platforms mentioned herein, and shall be approved by the Town Manger following the Commission’s approval of this policy.