

City of Colorado Springs Digital Accessibility Transition Plan



Current Practices and Future Commitments



2026

City of Colorado Springs Digital Accessibility Transition Plan Current Practices and Future Commitments.....	1
Introduction.....	4
State Accessibility Requirements.....	5
House Bills 21-1110 & 24-1454	5
8 CCR 1501-11 Technology Accessibility Rules	5
House Bill 25-1152.....	6
Federal Accessibility Requirements	6
Sections 504 and 508 of the Rehabilitation Act of 1973.....	6
Americans with Disabilities Act, as amended (ADA).....	7
Assistive Technology.....	7
Updated Definition	7
Purpose.....	7
Overview of Compliance Efforts/ History of City's Compliance Efforts.....	8
How the City Addresses Information and Technology Barriers.....	9
IT Service Management Software	9
Accessibility Prioritization Committee Re-Established	10
Governance, Roles, and Responsibilities.....	11
Enhancing Accessibility Governance: Revisions to the Digital Accessibility Policy and Administrative Regulation	11
Operational Structure: Roles and Responsibilities in Accessibility Compliance	13
Empowering Staff Through a Distributed Leadership Framework	15
Anchoring Accessibility in Organizational Culture.....	16
Prioritization, Testing, and Remediation	17
Testing Tools and Techniques - Overview	17
Scope of Testing	17
Evolving Testing Practices.....	17
Compliance and Continuous Improvement	18
Remediating Portable Document Files (PDFs).....	18

Vendor Voluntary Product Accessibility Template (VPAT) Review & Risk Assessment Process	25
Communications and Support	27
External Feedback Channels	27
Internal Feedback Channels	28
Website Accessibility.....	29
Mobile App Accessibility	30
Language Services	30
Maps and GIS Accessibility	31
Skills and Hiring	32
Accessibility Education Framework – Continued Education & Training	32
Accessible Hiring Practices	33
Software Development Life Cycle.....	33
Procurement and Vendors	33
Vendor Management.....	35
Kiosk Accessibility Plan (2026-2028).....	36
Municipal Accessibility Maturity Model (MAMM).....	39
Contextualizing Accessibility Vs. Usability	41
Municipal Accessibility Framework Components.....	41
Digital Accessibility City Survey	60
Survey Results – October 2025.....	63
Maturity Model Results	65

Introduction

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability in state and local government programs, services, and activities. The Department of Justice (DOJ), which enforces the ADA, has interpreted this to include access to online technology.

The City of Colorado Springs is committed to online accessibility for all citizens and has prepared this updated transition plan to identify online barriers to accessibility and our efforts to remove those barriers for people with disabilities through policy modification and training. The plan assists with a long-term strategic approach to continue to improve the accessibility of City Information Communication Technology (ICT).

This document summarizes the City's web accessibility ADA self-evaluation, transition plan, and ongoing management. This document is the result of coordination between the Information Technology (IT) department and the Office of Accessibility's management efforts to improve online technology as required by the City's [Digital Accessibility Administrative Regulations](#) signed by Mayor Yemi Mobolade on September 17, 2025. This document includes:

- An overview of the state and federal online accessibility requirements
- Our philosophy in building a culture promoting digital accessibility
- Our city-wide engagement approach
- Processes for creating accessible content, testing software, prioritization
- A review of City's compliance efforts
- Accessibility Maturity Model (Scores, Justification, Survey Data)
- Glossary of Terms

While this Transition Plan outlines the City's strategic framework and long-term approach to improving digital accessibility, it is distinct from our Quarterly Progress Reports. The Quarterly Progress Reports provide a data-driven snapshot of ongoing efforts, detailing measurable progress in key areas such as the number of documents remediated, website accessibility scores, and milestones achieved in accessibility-related projects. These reports serve as accountability tools that track implementation over time, whereas the Transition Plan serves as a guiding document for policy, planning, and sustained improvement.

State Accessibility Requirements

House Bills 21-1110 & 24-1454

House Bill 21-1110 requires state and local government entities to follow national accessibility standards known as WCAG 2.1 AA. These entities began planning in 2022 and were expected to meet these standards by July 1, 2024.

To support this effort, House Bill 24-1454 extended the deadline to July 1, 2025 for entities that show a good faith effort.

In May 2025, new rules were added to help state and local government entities better understand how to follow the law. They can meet the requirements by using accessible technology, offering alternate formats, or providing help when needed. They must also post an accessibility statement with at least two ways for people to ask for assistance. Additionally, only digital content that was currently in use needed to be accessible right away, and older content could be updated upon request.

These updates focused on steady progress, not perfection, and were designed to make sure everyone in Colorado can access public services equally, no matter how they connect.

8 CCR 1501-11 Technology Accessibility Rules

To guide this work, the state adopted 8 CCR 1501-11, Technology Accessibility Rules, which explain how to meet the requirements of House Bill 21-1110. These rules apply to both public-facing and internal digital tools that are in active use or created, updated, or purchased after July 1, 2024. If someone with a disability requests access to older content, the entity must provide an accessible version.

The rules also require an accessibility statement and a way for people to get help when digital content isn't usable. While they promote broad access, they also recognize that there are limits. The rules also require an accessibility statement and a way for people to get help when digital content isn't usable. While the goal is to make all digital tools accessible, the rules recognize that there are some exceptions. A state or local government entity is not required to make changes if doing so would:

- Impose an undue burden, meaning it would be extremely difficult or expensive based on the entity's resources,
- Fundamentally alter the nature of a program or service, or
- Pose a direct threat to the health or safety of others.

These exceptions are part of both state and federal accessibility laws. Even when an exception applies, entities are still encouraged to offer alternative ways to provide

access, such as offering information in a different format or providing personal assistance.

House Bill 25-1152

House Bill 25-1152 is a Colorado law that directly affects how cities and municipalities contract for digital services. Any agreement between a city and a technology vendor must now include enforceable accessibility requirements. These requirements are based on standards adopted by the Colorado Office of Information Technology under C.R.S. Section 24-85-103. If a vendor's product or service is not accessible to individuals with disabilities, the vendor, not the city, is responsible for fixing the issue and covering any related legal costs or damages.

This law applies to a wide range of digital tools, including websites, communication platforms, and software systems used by local governments. It ensures that cities are not left vulnerable to legal or financial consequences when vendors fail to meet accessibility standards. It also allows cities to request third-party verification of a vendor's compliance before signing a contract, helping to prevent problems before they arise.

Although the bill was originally written with public schools in mind, it reinforces accessibility obligations for all public entities in Colorado. This includes state agencies, counties, and municipalities. By aligning procurement practices with these standards, cities can ensure that their digital services are inclusive and legally compliant from the outset.

Federal Accessibility Requirements

Sections 504 and 508 of the Rehabilitation Act of 1973

Sections 504 and 508 are federal laws that protect the rights of people with disabilities. Section 504 makes sure that anyone with a disability has equal access to programs and services that receive federal money, like public schools, colleges, and government agencies. It requires these places to make changes or provide support so people with disabilities can fully take part. For example, students might get extra time on tests or help with notetaking through a "504 Plan." This law covers both visible and hidden disabilities, like ADHD or anxiety.

Section 508 focuses on technology. It says that federal agencies must make their websites, apps, videos, and digital documents accessible to people with disabilities. This means the technology must work with tools like screen readers or voice commands. If something can't be made fully accessible, the agency must still offer another way to get the same information. Together, Sections 504 and 508 help make sure people with disabilities can access both physical and digital spaces equally.

While Section 508 does not apply to the City since the City is not a federal agency, the City 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)

The Americans with Disabilities Act (ADA) is a federal civil rights law passed in 1990. It protects people with disabilities from discrimination in many areas of life, including jobs, schools, transportation, and public places like stores and restaurants. The ADA makes sure people with disabilities have the same rights and opportunities as everyone else. It applies to both public and private organizations that are open to the public and requires them to make reasonable changes so people with disabilities can fully participate.

In 2026, new digital accessibility guidance will be added to the ADA to help organizations better serve people with disabilities online. These updates will give clearer rules for websites, mobile apps, and digital documents, making sure they work with tools like screen readers and voice commands. The goal is to make digital spaces just as accessible as physical ones. This change reflects how much we rely on technology today and ensures that people with disabilities can fully access services, information, and opportunities in the digital world.

Assistive Technology

Assistive Technology (AT) devices and services are defined in the ADA and further detailed in the Individuals with Disabilities Education Act (IDEA). While the core definitions have remained consistent, significant developments have occurred since 2020 that have expanded the understanding, application, and expectations surrounding AT in educational and governmental settings.

Updated Definition

AT devices can best be defined 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 people with disabilities.

Purpose

The ultimate goal of AT remains unchanged: to enhance access to information, services, and environments. For example:

- A City resident who is blind may use a screen reader to navigate a website or complete assignments.

- A City resident who is deaf may rely on real-time captioning or closed captioning to access spoken content.
- A City resident with limited mobility may use eye-gaze technology or adaptive keyboards to interact with digital content.

Overview of Compliance Efforts/ History of City's Compliance Efforts

Since 2014, the City has engaged in several activities as part of its ongoing ADA web accessibility compliance efforts, including, but not limited to, the following:

- **2014** - The City began a review of its online ICT to assess any accessibility barriers persons with disabilities may face online, incorporating input solicited from the community and local disability rights agencies.
- **2017** - The City enlisted the services of SiteImprove, an online web application and quality assurance service that assists organizational leaders and content creators in remediation efforts and online barrier identification.
- **2018** – The City published its first Web Accessibility Statement.
- **2019** - The City designated a Web Accessibility Coordinator (Title II ADA Coordinator) who is responsible for coordinating the City's compliance with the ADA and who has experience in WCAG 2.0, the ADA, and general accessibility standards and acts as a Subject Matter Expert (SME) for the City.
- **2019** - The Office of Accessibility, along with the City's Communications Department, began reviewing new technology for accessibility.
 - In its assessment efforts, the City identified customer facing applications and portable document types that may create barriers to online accessibility.
- **2019** - The City updated its Website Accessibility Statement. This statement reflects the City'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.
- **2019** – The City completed assessments of its public facing applications and portable documents.
- **2020** – Mayor John Suthers' signed Administrative Regulation 2020-02, which established the City's ADA Online Accessibility Policy and mandates the City's efforts to meet web accessibility standards by June 2022 to the maximum extent feasible.
- **2020** – The Office of Accessibility completed its initial remediation and training work regarding external applications and portable documents.

- **2021** – The City, through the Accessibility Prioritization Committee established via the City’s ADA Online Accessibility Policy, adopted the Accessibility Maturity Model (AMM) to evaluate the success of its compliance efforts.
- **2021** – The City was awarded \$2,500 by the State Internet Portal Authority to improve the accessibility of its online technology, which includes HTML structured documents and Portal Document Formats (PDFs). The funding from this grant was used to improve the accessibility of the City’s Granicus Legistar product via a layover with adaptable accessibility features.
- **2024** – Digital Accessibility responsibilities and the Web Accessibility Coordinator position are separated from the Office of Accessibility and moved to the Innovation and Technology team for more synergy with regard to Application Accessibility and Document Remediation.
- **2025** – IT created the Business Office team and elevated the previous Web Coordinator to a Supervisory position. The team is made up of an IT Supervisor, Senior Web Accessibility Coordinator, Two Senior Analysts, and an Administrative Assistant I. Adding Digital Accessibility to this team helps to enhance operational efficiency by embedding accessibility expertise directly within IT with a team responsible for digital services.
- **2025** – Colorado’s Digital Accessibility Law HB 21-1110 went into effect on July 1, 2025.

How the City Addresses Information and Technology Barriers

IT Service Management Software

The City utilizes a centralized IT service management platform to streamline and automate the handling of service-related issues. This system supports the full lifecycle of IT service delivery, including the management of incidents, service requests, problems, changes, and assets. It also incorporates intelligent features such as automation and predictive analytics to enhance service efficiency and responsiveness.

Employees can submit tickets through multiple channels:

- Email,
- Telephone, or
- Employee Portal.

Once submitted, each ticket is tracked and managed through to resolution, ensuring accountability and timely support. The platform provides visibility into ticket status, facilitates communication between support teams and requesters, and helps prioritize issues based on urgency and impact.

Digital accessibility-related issues identified by the City are also submitted and managed through this system, ensuring consistent handling and resolution in alignment with broader IT service processes.

Accessibility Prioritization Committee Re-Established

The Accessibility Prioritization Committee was originally formed to support accessibility initiatives across city departments. While the committee held several meetings and began laying important groundwork, limited resources and staff turnover contributed to a pause in its activities. The need for a more sustainable and integrated model became clear over time.

Today, the City's approach to accessibility has matured. With growing awareness of digital inclusion and stronger collaboration across departments, including the Office of Accessibility, Information Technology, and Human Resources, the committee is being re-established with a broader, more strategic scope.

The reimagined Accessibility Prioritization Committee will serve as a cross-functional, community-engaged body addressing all dimensions of accessibility: digital, physical, programmatic, and linguistic. This inclusive structure reflects a commitment to equity and ensures that the perspectives of people with disabilities and other historically underserved communities are embedded in decision-making processes.

Over the past two years, foundational work has been completed to support this relaunch. Draft bylaws, a defined organizational structure, and a clear mission have been developed to guide the committee's work. These efforts have also prompted important discussions about legal alignment, digital accessibility governance, and long-term sustainability.

This is not simply a restart, but a strategic relaunch that reflects a broader cultural shift in how accessibility is approached across the city. With stronger institutional support and a more collaborative civic environment, the committee's goal is to become a central hub for policy development, community engagement, and accountability.

Re-establishing the Accessibility Prioritization Committee is a key component of the City's digital accessibility transition plan. It reinforces the principle that accessibility is a shared responsibility, one that must be embedded in the City's culture, operations, and digital infrastructure.