Electronic Information Resources Accessibility Implementation and Remediation Plan

May 2013

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Introduction

The Texas Department of Information Resources (DIR) requires that the agency's electronic and information resources (EIR) be accessible to staff and members of the public with disabilities. DIR is also committed to meeting these requirements by providing equal access to its EIR in accordance with the following:

- Section 508 of the Rehabilitation Act of 1973, as amended in 1998
- The Americans with Disabilities Act
- Texas Government Code Chapter 2054, Subchapter M (TGC 2054.451–464)
- Texas Administrative Codes 206 and 213 (1 TAC 206/213)

Texas Administrative Code (1 TAC 206.51/213.21) requires that each state agency develop an accessibility policy. DIR developed its accessibility policy in June 2009 and amended it in May 2013.

Furthermore, each state agency's accessibility policy must include a plan to address areas of non-compliance. The *2013 EIR Accessibility Implementation and Remediation Plan* (plan) describes DIR's detailed approach to testing and remediating inaccessible EIR, including

- Internet and intranet websites
- documents
- web and client applications
- telephones and other telecommunications products
- information kiosks
- transaction machines
- multimedia resource
- office equipment including copy machines and fax machines

The plan's implementation is monitored and documented, and the staff informs DIR's executive management about the plan's progress.

Note: For the purposes of this document, the term *state agency* is used inclusively to refer to state government agencies and institutions of higher education.

SECTION 1
DIR Websites

Websites provide people with disabilities increased access to electronic information. While it is important that all electronic information be accessible, websites are a priority, because they are often a primary communications tool between state agencies and their constituents.

1.1 Testing Websites

Key portions of DIR public websites are scanned on a monthly basis using an automated accessibility web scanning tool. The tool identifies common accessibility errors and generates a report documenting any errors found.

DIR plans to begin monthly automated testing on its internal website in September 2014. The test will focus on evaluating the areas available to all DIR employees. The agency may also test password-protected areas, as determined by management, and other pages (i.e., third-party sites or sponsored pages) identified as high-traffic portions of DIR's public facing or internal web environment.

1.2 Repairing Problems

The automated accessibility web-scanning tool generates a report documenting the scanned web pages that do not conform to accessibility requirements. The DIR Accessibility Coordinator will share the results with web publishers and/or the owners of the non-compliant pages and request remediation of certain identified page or content. The web publishers and/or the owners of the non-compliant pages will remediate the page or obtain an accessibility exception. Each content producer will correct the errors as soon as possible and will notify the Accessibility Coordinator when the corrections are completed. Repeated scans of pages with errors will allow the Accessibility Coordinator to track monthly progress.

Because the scanning technology cannot test for all conditions of compliance with accessibility standards, Webservices staff will manually inspect select pages to validate the accessibility criteria that the scan tools are unable to assess. Manual testing allows the tester to identify recurring issues and suggest general coding changes to improve all similar web pages. Others issues, such as missing image descriptions (alternative tags), must be added manually.

The DIR Accessibility Coordinator monitors findings and reports results to DIR's management on a quarterly basis.

1.3 Web-Delivered Documents and Other EIR

Beginning in FY 2014, all new documents published on DIR's internal and external websites will be accessible. When legal requirements make it necessary to post an inaccessible report promptly, the author will produce an accessible document for publication within 60 days. DIR management will grant exceptions on a case-by-case basis. See Section 3 – Exceptions for Inaccessible EIR for information about the DIR exception policy.

In addition to ensuring that all new web and EIR content is accessible, Webservices and Publications staff will purge older, inaccessible documents and other EIR items from the

agency's websites. Consequently, the vast majority of documents and other EIR on DIR websites will become accessible over time.

The accessibility web scanning tool will test PDF documents on the web pages, but it cannot scan other document types (e.g., Microsoft Office documents, audio and video files, etc.) posted on websites to check for accessibility issues.

In 2011, DIR migrated to Microsoft Office 2010, which provides built-in, robust accessibility checkers for Office documents. All DIR document creators will be required to use these built-in accessibility tools to ensure their documents are accessible. See Section 2.3 – Office and Other Document Types for additional information.

Web publishing staff or the Accessibility Coordinator will return inaccessible documents to the content owner for reformatting and provide assistance as needed. The owner will correct the material or request an exception.

1.4 Graphically Designed Documents

DIR currently uses SharePoint Designer and Adobe Creative Suite to produce accessible graphically designed documents. These documents may include brochures, posters, and other documents that are both printed and posted on the agency's websites. Beginning in FY 2014, all graphically designed documents will be in accessible formats. When legal requirements make it necessary to post an inaccessible report promptly, the author will produce an accessible document for publication within 60 days. DIR management will grant exceptions on a case-by-case basis.

1.5 Online Forms

Webservices and Publications staff are developing procedures for accessible online forms. These will include
- Manual testing of forms posted on DIR's website using visual inspection, page checking tools, and assistive technologies, such as JAWS, WindowEyes, Voiceover, or other software utilized by people who are blind or visually impaired so electronic documents can be read aloud
- Providing DIR staff with training or information on how to create the forms they produce and post on the DIR website
- Reformatting existing forms, as needed, to conform to the guide, and testing corrected forms with an assistive technology prior to re-posting

1.6 Web-Delivered Video, Videoconferencing, Collaboration Tools, and Other Multimedia Content

DIR staff will ensure that web-delivered video, conferencing, collaboration tools, and other multimedia content are accessible by selecting production tools and vendor products/services that integrate captioning into the video, and that use accessible interfaces to deliver accessible content. DIR staff will work with the Accessibility Coordinator and technical staff to ensure these EIR are accessible.

The agency's testing and compliance methods include
- Using testing tools and manual testing or inspection
- Applying accessibility specification requirements to all contracts that directly or indirectly include the development or provision of multimedia web content

Captions must be included in all web video and multimedia productions that support the agency's mission and that contain speech or other audio information necessary for comprehension of the content. Regardless of the format, DIR staff cannot post content without captioning. All recorded audio-only media presentations must include a posted text transcript upon request.

Staff must remediate inaccessible video content within a reasonable amount of time, or the content owner must file an EIR accessibility exception. When non-content (videoconferencing, collaboration tools, players, applications, etc.) accessibility issues are discovered, DIR will notify the vendor for remediation.

When considering an EIR accessibility exception, DIR will evaluate target audiences and the conferencing, collaboration tools, and other multimedia content, based on significant difficulty or expense.

1.7 Social Media Content

In accordance with the DIR Social Media Policy, DIR staff posting agency content to social media sites will make every effort to ensure the accessibility of agency content, including captioning video content, even if the sites are not accessible. Content producers posting to social media websites will perform manual accessibility testing on all content prior to posting.

1.8 Website Clean-up

Archiving or eliminating outdated and orphaned content will improve the overall accessibility of DIR websites. Eliminating this "clutter" allows the agency to ensure that the content is accessible to the people who really need it. This approach will reduce the number of inaccessible pages and documents, thereby simplifying remediation.

1.9 Accessibility of New Web Pages and Content

DIR technical staff use development tools that support the accessibility technical coding standards as defined in 1 TAC 206/213, and ensures that new web designs and documents are accessible by
- Developing web pages and applications that adhere to these standards
- Using website style guides and other relevant style formatting documents that include EIR accessibility criteria
- Testing newly developed web pages and content to ensure it meets 1 TAC 206/213 standards. If any of this material is inaccessible, it will be fixed or returned to its authors for remediation
- Including accessibility specifications in all its bid solicitations and contracts that directly or indirectly include the development or provision of web pages/web applications

1.10 Determination and Repair of Web Application Accessibility Problems

DIR uses automated accessibility web scanning and manual testing to
- Audit its public web applications
- Identify accessibility problems
- Assign them for remediation

All DIR web applications must be made accessible; however, because of the costs and complexities of making applications accessible, DIR will remediate related issues based on the priority criteria it has established to allow developers to approach the task systematically.

As part of its prioritization process, the number and type of users, the nature of the application, and other criteria are considered. See Section 4 – Prioritizing EIR Accessibility Efforts.

DIR technical staff and the EIR Accessibility Coordinator will conduct manual inspections and assessments of all web applications prior to deployment. This includes password-protected applications that cannot be scanned using automated accessibility web scanning.

DIR will take the following steps to assure that all future applications are accessible:
- Integrate accessibility criteria into DIR's development and procurement processes to ensure that accessibility is considered at every stage of development, from design to release
- Train application and web developers using the DIR Accessibility Role-Based Training Plan to ensure that staff has the appropriate accessibility coding and analytical skills (see Section 5 – Training)
- Engage internal or external accessibility specialists to ensure that DIR application developers receive usability testing, mentoring, and training

Accessibility of Non-Web EIR

In addition to DIR websites and their content, all other EIR, as defined in 1 TAC 213, must also be accessible. These include

- software and software applications
- telecommunications equipment
- documents
- software applications and operating systems
- telecommunications products
- video and multimedia products
- self-contained, closed products
- desktop and portable computers
- information, documentation, and support

2.1 Testing

Automated accessibility checking tools for non-web EIR are limited; therefore, testers must also manually test materials. Microsoft Office 2010 includes built-in accessibility checking tools for Microsoft Office documents; therefore document producers will employ these tools to ensure the creation of accessible documents. The agency's staff will manually inspect all documents for conditions that the built-in tools are unable to check (e.g., the adequacy of alternate text descriptions, font size, and color contrast). Using this approach will allow the agency to forgo additional labor-intensive testing with a screen reader. DIR technical staff may still need to test a document with a screen reader if the document is large and complex or is intended for a broad audience.

For other non-web EIR and EIR applications, manual testing using code inspection and page-checking tools that are appropriate to the EIR technology being developed or procured will be used. Testers will visually inspect and test EIR materials with assistive technologies (JAWS, Voiceover, etc.).

2.2 Repairing Problems

DIR's Accessibility Coordinator will work with content owners and technical staff to document issues that do not meet Texas accessibility standards. Depending on the specific EIR issues, the material may

- Be quickly corrected (a simple document, for example)
- Require a corrective action plan to bring the EIR into compliance
- Require an exception (which includes a plan for compliance and other criteria)

For procured EIR, DIR procurement staff, the Accessibility Coordinator, or technical staff will document and communicate the accessibility criteria to the vendor and request the vendor submit a plan for compliance or other action depending on the terms and conditions of the contract. DIR technical staff will validate repairs.

2.3 Office and Other Document Types

DIR staff uses Microsoft Office to create most of the documents and forms it uses and distributes. It is essential that these documents are accessible. DIR will inform all staff of the need to create Office documents and other document types in an accessible form. Staff will receive guidelines on recommended formats and document types, based on audience and use.

Office 2010 and Office 365 provide built-in, robust accessibility checkers for documents. All DIR document creators will be required to use these built-in accessibility tools to ensure their documents are accessible. The use of these features in Microsoft Office applications should significantly reduce the number of inaccessible documents created by DIR. Complex documents may also require manual testing by DIR Webservices, which would include the use of assistive technology such as JAWS or Voiceover.

DIR's EIR Accessibility Coordinator and technical staff continue to explore the feasibility of developing technologies that may simplify the process of creating accessible documents and PDFs.

2.4 Graphical Documents Designed for Printing

Graphical documents may include brochures, posters, and other types of printable documents. Whenever possible, graphically designed documents will be created in accessible formats. If the material is not accessible, the content creator will provide an accessible version (e.g., a text document) at the time of publishing. When legal requirements make it necessary to post an inaccessible report promptly, the author will produce an accessible document for publication within 60 days.

2.5 Non-Web Video, Videoconferencing, Collaboration Tools, and Other Multimedia

See Section 1.6 – Web-Delivered Video, Videoconferencing, Collaboration Tools, and Other Multimedia.

2.6 Accessibility of Newly Developed EIR

DIR staff ensures that newly developed EIR are accessible by
- Selecting development platforms that produce accessible output and that contain accessible developer tools
- Using tools and training that support technical coding standards as defined in 1 TAC 206/213.
- Only using style guides that contain EIR accessibility criteria
- Testing newly developed EIR at multiple points during the development process so issues can be resolved prior to release

Additionally, DIR technical staff will integrate accessibility criteria into their development processes to ensure accessibility is considered at the inception of any development activity.

2.7   Accessibility of New EIR procurements

DIR procurement staff ensure that procured EIR are accessible by
- Integrating state accessibility requirements into EIR bid solicitations and contracts
- Evaluating the vendor's Voluntary Product Accessibility Template (VPAT) and other accessibility documentation
- Validating vendor EIR accessibility compliance levels against their documentation provided in bid responses
- Validating selected vendor accessibility test and production environments (including vendor-hosted EIR)
- Including accessibility specifications in all bid solicitations and contracts that directly or indirectly include the development or provision of EIR

Additionally, procurement staff will integrate accessibility criteria into its procurement processes to ensure that the agency considers accessibility throughout the procurement life cycle.

2.8   Discovery and Repair of Inaccessible Non-Web EIR

DIR technical staff will conduct manual inspections and assessments of non-web EIR on a priority basis. This includes both DIR-developed EIR and DIR-procured EIR.

As part of its prioritization process, DIR will consider the number of people who will use the EIR, the critical nature of the EIR, and other characteristics based on user needs and other criteria.

Because of the costs and complexities of making some EIR accessible, DIR will remediate related issues based on the priority criteria (see Section 4 – Prioritizing Accessibility Efforts) it has established in order to allow developers to systematically approach the task.

When DIR staff have identified accessibility issues with procured EIR, procurement staff and the EIR Accessibility Coordinator will notify the vendor and request that the vendor implement a corrective action plan.

DIR will take the following steps to assure the accessibility of all EIR that are developed or procured in the future:
- Integrate accessibility criteria into DIR's development and procurement processes to address the accessibility of the materials at every stage of these processes
- Use the DIR Accessibility Role-Based Training Plan (see Section 5 – Training) to train application and web developers to ensure that agency staff have the appropriate accessibility coding and analytical skills
- Engage internal or external accessibility specialists to test the accessibility of the agency's EIR material

Exceptions for Inaccessible EIR

TGC 2054.460 allows exceptions to accessibility requirements if compliance would impose a significant difficulty or expense to the agency. To obtain an exception, the owner of the EIR must complete the Accessibility Exception Request Form and submit it to the Accessibility Coordinator. The requestor must justify the request and explain the costs that are to be avoided, set an expiration date on the exception, and provide a plan for alternative accommodations to meet the needs of people with disabilities. The Accessibility Coordinator evaluates the requests and makes a recommendation to the Executive Director, who either approves or rejects the request. The Accessibility Coordinator is the custodian of these records.

Prioritizing EIR Accessibility Efforts

While it is important that all EIR are accessible, some types of EIR have a higher priority. As part of its overall accessibility strategy, DIR has developed a prioritization scheme based on the key characteristics of the agency's EIR. The approach is designed to achieve the highest level of accessibility as quickly as possible for the greatest number of people possible within the limits of agency staffing, funding, and technology.

DIR considers the following criteria when prioritizing EIR accessibility projects it undertakes and in which order:

1. Externally facing, mission-critical with more than 5,000 external users (includes all Internet pages)

2. Externally facing, non-mission critical EIR with more than 5,000 external users

3. Externally facing, mission-critical EIR with fewer than 5,000 external users

4. Externally facing, non-mission critical EIR with fewer than 5,000 external users

5. Internal DIR use, mission-critical EIR

6. Internal DIR use, non-mission critical EIR

DIR also considers the following criteria:

1. The availability of alternate, accessible products, services, or solutions

2. The availability of budget and resources to address the problems

3. The cost/benefit analysis for accessibility of the EIR

4. Where the EIR is in its lifecycle

Training

DIR management will ensure appropriate staff receives training necessary to meet all accessibility-related rules. This includes, but is not limited to, application document creators, application developers, web content developers, EIR testers, and EIR procurement staff.

5.1 Training Staff Members to Make EIR Accessible

DIR management ensures that staff members receive EIR accessibility training appropriate to their job function. Methods to facilitate training include:

- The DIR Accessibility Coordinator works with the agency's staff to develop agency training plans and works with various agencies and external training vendors to provide training based on staff roles.
- DIR will provide links from the DIR intranet to guides and instructional tools that teach staff how to create accessible documents.
- DIR will publish articles in its employee newsletter to build awareness of the issue, explain responsibilities, and direct staff to instructional tools.

5.2 Accessibility Awareness and Roles-Based Training

In 2012, DIR employed a web-based introductory training course to fulfill a requirement for basic training of all DIR staff members. DIR will also add accessibility awareness training for newly hired DIR employees. Staff will repeat training every two years.

DIR has developed a role-based training plan that addresses accessibility-training requirements. This training plan includes introductory, basic, intermediate, advanced, and specialized training on accessibility issues for all staff members. These training courses may be available within DIR, through HHSC training services, or from external suppliers and will include the following course levels:

- **Introductory** – Introductory training entails high-level online training for all DIR staff members. This training includes:
  - an overview of EIR accessibility
  - policy and procedures
  - assistive technologies
  - examples of accessible electronic and information resources

- **Basic** – Basic training guides staff members through the process of developing accessible electronic information using standard desktop applications.

- **Intermediate** – Intermediate training teaches staff members to write, maintain, and review web-based electronic information. This includes accessible Web pages, forms, and tables. This training applies to a relatively small number of staff members.

- **Advanced** – Advanced training provides technical training for web and applications developers and other Information Technology (IT) staff members.

- **Specialized** – Specialized courses provide training for a variety of specialized staff members, ranging from IT purchasers to procurement, and contracting staff members and, to

communications staff members, etc. The Accessibility Coordinator and applicable management evaluate the need for specialized training on a case-by-case basis. The Accessibility Coordinator will continue to identify specialized training resources, such as the free online courses, available at www.section508.gov.

5.3 Accessible Documents Training

All DIR staff are required to complete accessibility training to increase their knowledge and ability to create documents and other materials in accessible formats. Additionally, staff will receive guidelines on the recommended formats and document types to post, based on audience and use.

DIR makes resources available on how to create accessible documents and trains key staff on how to format Microsoft Office documents for Word, Excel, and PowerPoint. DIR will continue to make training available to staff so they can learn how to create accessible PDFs and other document types, as well as other EIR.

Communications Plan

In addition to providing accessibility awareness training for all DIR staff, DIR management will communicate how accessibility affects employees' jobs and that all information is subject to accessibility requirements. DIR management will

- Use a variety of communications vehicles explain to all staff members what EIR accessibility means, why it is important, and why addressing it is mandatory
- Identify training and resources to help the agency's staff acquire the skills they need to incorporate accessibility into their daily work
- Publish a link to the EIR accessibility section of the DIR website
- Use communications tools (newsletters, intranet, email, etc.) to promote new accessibility training and resources, as they become available

Tracking EIR Accessibility Progress

The Accessibility Coordinator and management will establish quality metrics for EIR and track progress of external and internal EIR accessibility by comparing the results of web accessibility scan results over time.

For non-web EIR, DIR maintains an inventory of all EIR that is in production. DIR will add specific accessibility status information for each reported application, as available. The accessibility status information collected should include

- Whether the application is purchased or internally developed
- Whether the application is hosted externally by a third party
- The accessibility status of the application
- The accessibility testing completion date for the current release
- The planned accessibility date, if not already accessible
- The accessibility exception signature date for non-accessible applications
- The alternate access method in place for non-accessible applications

DIR will use the collected information to track progress towards meeting the agency's established accessibility goals.

Reporting of Accessibility Issues or Problems

Employees or the public may report technical or accessibility issues relating to EIR accessibility. Issues may be reported via the Contact Us links on the DIR public website or via email to the DIR Accessibility Coordinator through the agency's employee intranet. If a DIR staff member receives a formal accessibility complaint from an employee or the public, the staff member must refer the complaint to the Accessibility Coordinator within 10 calendar days. These complaints could be related to the receipt of services or problems accessing EIR. The Accessibility Coordinator will assign the issue to the content owner or the appropriate manager for remediation, and follow-up to ensure proper action has been taken.

Responsibility for Ensuring EIR Accessibility

DIR must comply with all provisions of TGC 2054.451–464 (Information Resources Management Act: Access to Electronic and Information Resources by Individuals with Disabilities) and 1 TAC 206/213.

Failure to comply with the above provisions can result in
- Delay of EIR procurements
- Delay or cancellation of EIR deployments

9.1 Executive Director

DIR's Executive Director is ultimately responsible for the accessibility of the agency's EIR. The Executive Director is accountable to the Legislature and the Governor. The agency's management personnel also have responsibilities and accountability for the accessibility of the agency's EIR.

9.2 Accessibility Coordinator

The Accessibility Coordinator is accountable to his or her immediate manager and the Executive Director. The responsibilities of the Accessibility Coordinator include
- Ensuring that agency policies and business practices are consistent with the agency's EIR accessibility policy and that they meet the accessibility requirements in 1 TAC 206/213
- Recommending and overseeing a process to regularly test and validate agency websites, EIR, applications, or products for compliance with the agency's EIR accessibility standards
- Developing and overseeing corrective action plans to remediate non-compliant websites, EIR, applications, or products
- Promoting EIR accessibility requirements to agency staff by coordinating or providing training, technical support, and presentations in order to support implementation and monitoring of effective accessibility standards
- Coordinating and producing accessibility surveys as required in 1 TAC 213.20
- Coordinating with the agency's software development teams to ensure that accessibility functionality and testing are built into the development lifecycle of new and enhanced products
- Consulting with the agency's executive staff on accessibility issues, such as
  - evaluating new software and hardware (e.g., validating the VPAT)
  - suggesting effective, alternative access methods for inaccessible EIR
- Serving as a consultant to the Executive Director to review requests for exceptions
- Providing a process by which the public and DIR's staff can report non-compliant websites, EIR applications, or EIR products to the Accessibility Coordinator
- Reporting regularly to the Executive Director and executive team on the progress of efforts to make the agency's EIR accessible
- Maintaining and updating the EIR Accessibility Implementation and Remediation Plan

9.3 Information Resources Manager

The Information Resource Manager (IRM) works cooperatively with the Accessibility Coordinator in the execution of the EIR Accessibility Implementation and Remediation Plan. The IRM is accountable to the Executive Director and the Chief Operating Officer.

The IRM is responsible for ensuring that departmental staff obtains accessibility training as appropriate.

9.4 Application Developers, Web Developers, and Web Content Producers

Application developers, web developers, and web content producers are responsible for the accessibility of EIR they produce. As such, they are accountable to their managers and to the Accessibility Coordinator. If developers or content producers fail to make good faith efforts to make their products accessible, the Accessibility Coordinator will solicit the assistance of the responsible managers to remediate the issue. If the issue cannot be resolved through their managers, the Accessibility Coordinator may bring the issues to others in the chain of command, including the Executive Director, if necessary.

The responsibilities of the application developers, web developers, web content producers, and their managers include
- Acquiring the necessary training and skills needed to make their products accessible
- Incorporating accessibility considerations into every phase of development and production, including application and website updates
- Making good faith efforts to correct accessibility problems as they are identified
- Elevating issues to the Accessibility Coordinator when a solution is unavailable or an exception might be necessary

9.5 Procurement and Contract Managers

Procurement and contract managers are accountable to their supervisors, the Accessibility Coordinator (for EIR Accessibility of procured products and services), and, ultimately, the Executive Director. Procurement and contract managers are responsible for the following:
- Assuring that EIR accessibility requirements are included in bid solicitations, vendor bid responses, and procurement contact language
- Making preliminary assessments regarding the availability of commercial EIR technology services with features that support accessibility
- Researching information from the vendor's VPAT
- Working with the Accessibility Coordinator or other parties to validate vendor-supplied accessibility information

DIR Stakeholders

Chief Administrative Officer
Lori Person

Chief Financial Officer
Nick Villalpando

Communications and Strategic Partnerships
Lisa Nowotny, Vivian Cullipher, Thomas Johnson

Human Resources
Ivan Smith

Information Resources Manager
Todd Kimbriel

IT Operations
David Smith, Allan Martin, Paige Heard

Legal
Martin Zelinsky

Program and Portfolio Management Office
Diana Taylor

Statewide Accessibility Coordinator
Jeff Kline

Telecommunications Services
John Hoffman

Texas.gov
Janet Gilmore

Technology Planning, Policy, and Governance
Deborah Hujar

Technology Sourcing Office
Mary Cheryl Dorwart