

Pikes Peak Workforce Center Digital Accessibility Plan

Digital Accessibility Plan Date Created: June 2025

This Digital Accessibility Plan is a dynamic document subject to change based on evolving legal requirements, technological advancements, resource availability, and organizational needs. The Pikes Peak Workforce Center reserves the right to modify or adjust strategies and timelines as necessary to ensure effective and sustainable accessibility practices.

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❖ **Executive Summary**

This plan outlines the strategic actions, timelines, and resource requirements for the Pikes Peak Workforce Center (PPWFC) to achieve full compliance with Colorado's digital accessibility laws, including House Bill 21-1110, Senate Bill 23-244, and House Bill 24-1454. These laws mandate that public entities comply with the Web Content Accessibility Guidelines (WCAG) 2.1 AA standards for all digital content and systems. This includes Information and Communication Technology (ICT), which refers to websites, digital documents, videos, software, and other tools used to access or deliver public services.

To implement these laws, the Colorado Office of Information Technology adopted Technology Accessibility Rules (8 CCR 1501-11), which require entities to post a public accessibility plan and provide accessible ICT by July 1, 2025. PPWFC will initially operate under compliance models "C" (Accessibility Plan) and "D" (Reasonable Modifications and Accommodations), with the goal of reaching full compliance under model "A" (Technical Standards). This document will be reviewed, updated, and republished annually to maintain compliance and demonstrate good faith efforts under the law.

❖ **Technology Accessibility Statement**

PPWFC is committed to ensuring digital accessibility for all individuals, including those with disabilities. Our goal is to provide inclusive access to our information and services, adhering to the Web Content Accessibility Guidelines (WCAG) 2.1 AA. We regularly evaluate and improve our digital content to meet these standards. If you encounter accessibility barriers or require accommodations, please contact us via email at accessibility@ppwfc.org or by calling 719-667-3700.

❖ **Scope**

This Digital Accessibility Plan applies to all Information and Communication Technology (ICT) under the responsibility of the PPWFC. This includes:

- **Websites and Web Applications:** All internal and external sites, including public job portals, service pages, and internal staff platforms.
- **Digital Documents and PDFs:** All publicly posted and internal-use documents, including forms, flyers, and reports.
- **Multimedia Content:** Videos, audio recordings, and livestreams, including training materials and public-facing announcements.
- **Software and Systems:** Any platform or tool used for service delivery or employee tasks, whether locally hosted or cloud-based.
- **Hardware and Physical Interfaces:** Computers, kiosks, phones, assistive listening systems, and other public-use or staff-facing equipment.
- **Communication Tools and Outreach Materials:** Email templates, newsletters, digital signage, and social media content.

This scope ensures PPWFC’s digital accessibility efforts extend across all formats and platforms used by both staff and the public.

❖ **Legal and Regulatory Requirements**

The following laws and regulations form the foundation of this Digital Accessibility Plan:

- **House Bill 21-1110 (2021)**
Enacted in 2021, this law requires all Colorado state and local government entities to meet the accessibility standards outlined in WCAG 2.1 AA for their websites and other digital services.
- **Senate Bill 23-244 (2023)**
Passed in 2023, this bill refined and clarified the requirements established in HB21-1110, updated language, and aligned accessibility terminology with federal standards.

- **House Bill 24-1454 (2024)**

This 2024 legislation added enforcement mechanisms and established a one-year “immunity period,” ending July 1, 2025, for public entities to demonstrate good faith efforts toward digital accessibility compliance.

- **8 CCR 1501-11 (Technology Accessibility Rules, 2025)**

Adopted by the Colorado Office of Information Technology (OIT) in May 2025, this rule formalizes the technical requirements and procedures for implementation. It requires entities to post an accessibility plan, a public-facing accessibility statement, and maintain an accessible ICT environment by July 1, 20

❖ **Current Progress**

PPWFC has already taken several initial steps to build awareness, begin remediation efforts, and prepare for full compliance with state digital accessibility laws.

- Created and presented a digital accessibility flyer emphasizing its importance to staff.
- Providing ongoing SharePoint training.
- Initiated SharePoint migration project, with approximately 25% of active files reviewed and organized for accessibility and retention.
- Established a progress tracking and reporting system.
- Continued use of ADA Site Compliance for biannual website scans and issue resolution.
- Prepared a Technology Accessibility Statement for publication.
- Transitioned IT support responsibilities to El Paso County IT, managed internally by the Accessibility Coordinator.

❖ Compliance Models

This plan follows the compliance framework outlined in the Colorado Office of Information Technology's Technology Accessibility Rules (8 CCR 1501-11), which establish five models of compliance (Models A through E). While each model serves a specific role, PPWFC will implement and transition between the three most applicable: Model C, Model D, and ultimately Model A.

- **Model A** represents the highest level of accessibility compliance. It requires full adherence to WCAG 2.1 AA technical standards for all Information and Communication Technology (ICT), along with documented policies, regular accessibility audits, and a process for tracking and justifying exceptions to non-conforming content.
- **Model C** demonstrates good faith efforts through the creation and active maintenance of an Accessibility Plan.
- **Model D** ensures that reasonable modifications and accommodations are provided upon request in accordance with documented policies.

PPWFC will phase in its compliance with these models over a three-year period:

- **Year 1: July 2025 – June 2026**

PPWFC will operate under Models C and D. The focus will be on foundational training, SharePoint organization, internal awareness, and early remediation efforts.

- **Year 2: July 2026 – June 2027**

PPWFC will continue with Models C and D while preparing to meet Model A standards. This includes adopting accessible content creation practices, conducting internal scans, and building policy and technical infrastructure.

- **Year 3: July 2027 – June 2028**

PPWFC will fully implement Model A, including documented exception tracking, regular audits, integration of accessibility into all ICT practices, and refinement of procurement and onboarding systems to support long-term sustainability.

❖ **Roles and Responsibilities**

The successful implementation of this plan depends on collaboration across departments and coordination with external partners. The following roles are responsible for driving progress and ensuring compliance:

- **Accessibility Coordinator:** Oversight, coordination, compliance tracking, training implementation, internal IT troubleshooting.
- **Digital Strategy & Technology department (DST):** Technical implementation, hardware/software updates (coordinated with IT management).
- **Team Managers:** Ensuring compliance and departmental adherence.
- **PPWFC Advisory Group:** Will be established near the end of 2025, with one representative identified from each team. The group will begin meeting after foundational staff training is complete. Members will serve as compliance liaisons, support ongoing accessibility monitoring, reinforce good practices, and assist with team-level coordination during audits or content reviews. The group will not design policy or training.

❖ **Implementation Timeline**

The following phased timeline outlines how PPWFC will build awareness, roll out training, implement accessibility practices, and reach full compliance over a two-year period. Each phase builds on the last, gradually scaling up accessibility capacity across the organization.

➤ **Phase 1 (July 2025 – Jan 2026): Preparation & Awareness**

- Launch internal awareness efforts using desk aids, short videos, and the digital accessibility flyer.
- Deliver an internal training session at the end of Quarter 1 on the importance of digital accessibility and how clients engage with PPWFC.
- Initiate introductory digital accessibility training in October with the Rocky Mountain ADA Center.
- Conduct ICT inventory and categorize by use and accessibility impact.
- Begin document remediation and archiving, utilizing Continual Engine PREP for PDFs.
- Identify and plan procurement for non-compliant hardware.
- Prepare foundational materials and schedule for Phase 2 trainings (e.g., Word, Excel accessibility).

➤ **Phase 2 (Jan 2026 – July 2026): Implementation & Remediation**

- Launch foundational training modules on accessibility in Word and Excel to build baseline skills across staff.
- Develop guidance and training for content creators managing social media or public outreach materials.
- Address critical accessibility issues in public-facing web content.
- Begin document remediation and archiving, utilizing Continual Engine PREP for PDFs.
- Implement SOPs for creating accessible new content.
- Procure accessible hardware and software in coordination with El Paso County IT.

➤ **Phase 3 (July 2026 – Jan 2027): Systematic Integration**

- Offer optional advanced training for power users seeking deeper accessibility proficiency in Microsoft Office tools such as Word, Excel, and PowerPoint.
- Maintain continuous learning opportunities through ongoing workshops and biweekly accessibility newsletters.
- Conduct quarterly audits and accessibility reviews.
- Integrate accessibility requirements into policies and procurement processes.

➤ **Phase 4 (Jan 2027 – July 2027): Refinement & Full Compliance**

- Finalize transition to full compliance under Technical Standards (Model A).
- Complete hardware upgrades and replacements.
- Conduct comprehensive audits and prepare final reports.
- Establish infrastructure for long-term sustainability and continuous improvement.

❖ **Budget Considerations**

To support successful implementation, PPWFC will allocate resources toward critical accessibility infrastructure, staff training, and ongoing support. Budget planning takes into account both initial setup costs and recurring expenses needed to maintain compliance.

- **Initial Year Costs:** Document remediation, training resources, compliant hardware/software acquisition, including licensing and integration of Continual Engine PREP for PDF remediation.
- **Ongoing Costs:** Continued training, hardware/software maintenance, regular audits, Continual Engine PREP subscription renewal.

❖ **Compliance & Reporting**

To maintain accountability and ensure long-term success, PPWFC will monitor progress through structured reporting, staff engagement, and documentation. This section outlines how accessibility initiatives will be tracked, improved, and integrated into daily operations.

Staff and Management Engagement

- Monthly check-ins between the Accessibility Coordinator and direct manager.
- Regular briefings and reports to senior management.

Accessible Procurement Process

- All formal procurement processes are managed by El Paso County. PPWFC contributes to vendor and software selection by identifying accessibility-compliant options during the evaluation phase. Digital accessibility in procurement is not yet mandatory for El Paso County; however, enforcement is anticipated under Model A requirements in the future.
- PPWFC's role is proactive rather than enforcement-based. We will continue screening for accessibility compliance early in the selection process to ensure smoother alignment as county-wide enforcement expectations increase. This approach also extends to contractors and vendors; while we are not responsible for enforcing their compliance, we will advocate for accessibility standards to be included in contracts and scopes of work where feasible.

Documentation and Archiving

- Document remediation efforts, audit outcomes, decisions, and progress milestones for tracking and legal defensibility.

Continuous Professional Development

- Biweekly newsletters highlighting training and webinars.
- Annual refresher training following initial rollout.

- Onboarding training for new staff, including digital accessibility, SharePoint use, and PPWFC-specific procedures.

Risk Management

- Coordinate with external IT, noting limits on internal control.
- Plan around potential resource limitations.
- Adapt to changing standards and legal mandates.
- Promote management buy-in through consistent updates and engagement.

Feedback Integration

- Launch annual accessibility survey targeted to clients who self-identify as having disabilities. End of Sep.
- Offer open communication channels for ongoing feedback.

General Reporting

- Publish quarterly progress updates.
- Annually review and revise the Digital Accessibility Plan.