Digital Accessibility in Government / Executive Order 24-05: Phase 1 Project Detailed Deliverables

Project General Information

The Washington State enterprise Digital Accessibility in Government / Executive Order 24-05 Phase 1 Project (EO 24-05 Phase 1 Project) focuses on providing a set of comprehensive, basic foundational digital accessibility (DA) trainings and resource materials for all state staff. The set of materials are the primary project deliverables for the Phase 1 Project.

The Phase 1 Project is a state enterprise project. This means that all executive branch state organizations (or agencies, offices of the state, and state organizations) which function under the direction of the Office of the Governor, as well as judicial branch (Offices of the Courts) directly inform and receive benefit from this Phase 1 Project.

The Phase 1 Project is one part of the overall state enterprise Digital Accessibility in Government / EO 24-05 *Effort*. This distinction of the "Effort" is made to indicate this project is only one of the *multiple* state enterprise bodies of work occurring or planned across the state enterprise to accomplish ongoing digital accessibility in Washington State Government. The state enterprise Effort is led by a *Core Group* of representatives from each of the state agencies and state organizations noted in EO 24-05 as responsible for specific actions or deliverables, along with established state leads in digital accessibility enterprise efforts, who also hold *critical technical* expertise.

Phase 1 Project deliverables are designed to meet all Washington State and federal requirements for digital accessibility, doing so at the at the Web Content Accessibility Guidelines (WCAG) 2.2 Level AA standards. This aligns with requirements outlined in the updated Washington Technology Solutions (WaTech) state enterprise Digital Accessibility Policy (USER-01) and Standard (USER-01-01-S).

This document details the topics and essential elements covered within the comprehensive, basic foundational digital accessibility trainings and resource materials for all state staff. Providing this document in advance of project deliverables allows state agencies and organizations to focus your internal efforts and limited resources towards development of materials specific to your books of business, building on the foundational information covered by this project.

Current state employees interested in helping develop and test project deliverables are encouraged to complete the Volunteer Form. This form will remain open throughout the project and provides additional information about the different volunteer roles. Volunteers can also email the Washington State Disability Inclusion Network Business Resource Group (DIN BRG) as an alternative: din@ofm.wa.gov. At this time, volunteers are limited to current state employees only.

Bolding is used within this document to provide ease in readability for certain disabilities, and assist in knowing areas of emphasis. For sighted users not using the navigation pane, a link to the document's Table of Contents is provided within the footer of each page. It is placed in the footer to avoid screen

reader-users having to hear the link repeated multiple times. The link allows users to quickly move between different sections, for ease of reference and review of specific topic areas.

Introduction

The list of EO 24-05 Phase 1 Project "detailed deliverables" are the full set of headers and sub-headers following the Table of Contents.

Essential elements for deliverables are captured as the body of information that is under that topic's header or sub-header. More detail is given in areas where added context is necessary for a common understanding of what is included in that deliverable. This is provided to give clarity around the exact information getting covered. Areas with these added details are often topic areas that are:

- New
- Specific to government, or
- Few materials exist for that topic.

This level of detail is not included for more common topics.

> The specifics in the deliverables follow the litmus test of the *bare minimum* foundational knowledge *critical* for state staff to understand in order to meet the federal and state requirements for digital accessibility (DA) in government.
>
> These materials equip state staff with the necessary basic and foundational information to provide proper digital accessibility in all digital work products.

Staff will only be required to take trainings deemed necessary for their specific position and generally not all of the listed trainings. However, all trainings and materials will be available to all staff for accessing as soon as each one is approved, to give just-in-time resources and training support for staff.

Timeline and Rollout

Timeline: Before the end of October 2025 for the full set of deliverables.

- Available to all State of Washington staff.
- Available publicly from the DIN website, as an alternate access method.
- This deadline includes any new trainings developed for this effort.

It is anticipated there will be two rounds for materials becoming available to all state staff and publicly.

Round One materials are already developed, simply needing validation for use at the state enterprise level. These are also called "just-in-time" or "out-of-the-box" trainings or resources. Information in these developed resources may not cover details specific to state staff licenses or software capabilities. They may instead be general guidance that is readily available.

Round One also includes any trainings developed for a state agency or organization, which are being repurposed for use by the state enterprise.

Table of Contents

The first round leverages existing materials where possible, working to upskill all state staff quickly, increasing the state's ability to meet federal and state deadlines in early 2026.

Round One deliverables may not *fully* meet state staff needs for that topic area. For instance, the materials may cover some of the topic's essential elements, but not all. These materials provide staff with immediate information and capabilities that can be used while more tailored or supplemental materials are developed. The Round One materials also help the project team know where information gaps remain. Those gaps get filled during Round Two.

Round One deliverables should start being available in May or June 2025 and complete by August 2025.

Round Two are the trainings and materials developed to fill gaps identified in Round One. These include materials specific to state staff – including information specific to staff access, licenses, or other software capabilities or limitations. These new materials require more time than the first round to complete. New materials start getting developed as soon as gaps are identified, launching development for these materials during Round One.

Round Two deliverables should complete before the end of October 2025.

> The deadlines in this timeline are tailored to meet the federal and state deadlines for digital accessibility for state government. This project recognizes that all state staff need foundational knowledge and skills to:
>
> - Accomplish remediation (or fixing) of digital content impacted by those federal and state deadlines.
> - Create and maintain future digital content to meet the new digital accessibility requirements for state government.

Primary Topic Areas and Key Topic Area Groupings

The state enterprise Phase 1 Project covers four primary topic areas developing a comprehensive set of basic, foundational knowledge for all state staff. Each primary topic area addresses multiple key topic areas within that area's set. The "A" through "D" in this list represent primary topic areas. The bullets under each primary topic area represents the key topic areas grouped in that set.

The entire set of Phase 1 Project deliverables, combined together, makes up what is considered basic and foundational knowledge and skills for all state staff. These deliverables do *not* go into details specific to any particular role or position within state service (e.g., security specialist, IT developer, project manager, contracting manager, customer service or call center representative, etc.). Guidance, training, or resource materials specific to individual roles or positions are expected to build on the Phase 1 Project's foundation.

Many of the group "A" primary topic areas are intersectional (e.g., "Communications" crosses all group A topic areas), so details for group "A" areas of this document follow the path a new learner would need to sequentially build their understanding.

A. Base Foundational and New Materials Specific to WA State Government Digital Accessibility

Table of Contents

- Communications providing a general overview about the new federal and state requirements and the WCAG Guidelines that apply
- Motivational Videos for the Digital Accessibility in Government Efforts
- General Digital Accessibility in Government (laws, policies, deadlines, archiving parameters, best practices and guidance for state government, etc.)
- Plain Language for WCAG's Digital Accessibility Requirements
- Digital Accessibility Foundational Elements (user-friendly understanding of key elements for meeting WCAG, regardless of tool(s) being used / tool-agnostic)
- Web Content Accessibility for Content Developers and Web Managers (non-Tech individuals)

B. MS Base Tools Digital Accessibility
   - Word Accessibility
   - Excel Accessibility
   - Outlook Accessibility

C. Basic Interactive Tools Digital Accessibility
   - PowerPoint Accessibility
   - PDF Accessibility
   - MS Teams-Basic Accessibility
      i. MS Teams-Basic covers Teams chats and base features of MS Teams (features which are not specific to the Teams channels or Teams meetings accessibility, and not features which require higher-level licensing than basic state access in order to access)
   - Meeting Accessibility in MS Teams or Zoom Platforms

D. Communication Hubs Digital Accessibility
   - Media Accessibility
      i. Media references all three: Audio-only, Video-only, and Multimedia (or Audio plus Video) regardless of tool or platform or hub
   - MS SharePoint Online / MS Teams Channels Accessibility
      ii. Teams Channels create SharePoint Online sites, so together represent a key topic area
   - Social Media Accessibility

Planned Formats for Deliverables

Project deliverables are using multiple formats for each key topic area. This increases accessibility and provides ease in understanding for busy, adult learners and others.

The multiple formats are for the combined set of training and resource materials for each of the key topic areas. It does not reference all of the formats being part of a single training or resource within a key topic area.

Each key topic area generally plans to include, at a minimum, the following formats:

Table of Contents

1. Written Guide: Providing detailed, plain-language information for the entire foundational topic area. The details included provide specifics for all sub-topics, essential elements, and step-by-step processes for that foundational topic area. For instance, a Written Guide covering all specifics for basic accessibility in MS Word. These include any how-to details, as step-by-step processes, for creating accessible content and testing for accessibility. The step-by-step details include visuals for each step, such as screen images of the step. Those visuals include alt text for each image throughout that process.
2. Desk Reference Guides (typically one per sub-topic area and one for the entire foundational topic area overall): Concise versions of the information from the detailed written guide. These are the quick-reference versions that are tailored for a single sub-topic's essential elements or which provide a high-level overview for the entire foundational topic area. Desk Reference Guides include step-by-step processes with visuals. All visuals include alt text for each image throughout that process.
    a. Primary topic area Desk References include:
        i. General information to keep in mind (e.g., particular settings to check, templates to use / not use, etc.).
        ii. Checklist of areas to check to ensure the digital content is accessible.
    b. Sub-topic area Desk References include:
        i. General information of when to use the feature within that tool (e.g., when alt text should be applied, when to use headings, etc.)
        ii. Step-by-step instructions for processes to use that tool's feature (e.g., how to create or check alt text in a document, etc.)
3. Multimedia video(s): Brief video with audio (sound), transcript, and captions, and including ASL interpretation (as feasible). Videos are anticipated to be quite brief and most often will be centered around:
    a. Demonstrating step-by-step processes, or
    b. Supplying context and motivation for employee understanding (e.g., Why Accessibility Matters, Digital Accessibility for Washington State Services and Programs, etc.)
4. No Fail Assessments and Learning Boosters: Each topic or sub-topic area will include "No Fail Assessments" as part of the training materials. These assessments allow staff to practice applying the information learned during the training, with ability to continue attempts until their material passes accessibility standards. After completing training, staff who have their training tracked by the state learning system will receive Learning Boosters throughout the year. These boosters are sent directly to the staff, reminding them of the information and skills learned in the training, and provide staff the opportunity to interact with the booster and receive real-time feedback, helping to help keep those skills current.

Testing Process for All Project Deliverables

Phase 1 Project Leads determined required elements for gathering / developing and testing the training and resource materials considered "approved" project deliverables for state enterprise use. The process

uses a standardized approach to ensuring all deliverables meet the quality, accessibility, and technical requirements necessary for the state's success.

Testing Process Purpose

The testing process makes sure:

A. All deliverables meet the project's detailed deliverables, essential elements for each deliverable, and overall learning objectives for each topic and the project as a whole: Making sure that learners are receiving the right information and that it actually teaches them what they need to learn.
B. All deliverables are built for accessibility. The training and resource materials about accessibility must also follow accessibility standards in their formatting and programming. This helps make sure that the deliverables themselves work properly for individuals with disabilities accessing the training or resource materials.
C. All deliverables meet related state requirements, such as the Plain Language Guidelines accommodating language access needs.

Testing Process Required Elements

1. Compiling Existing Materials: Existing training and resource materials compiled for the topic area deliverables and essential elements. When existing materials do not exist for a deliverable or essential elements of the deliverable, these are identified as "gap areas," and the topic area workgroup launches development of new materials to fill these gaps.
2. Initial Testing of Materials: Materials go through a standardized scoring rubric to test that the materials meet all three criteria listed in the "Testing Process Purpose." The initial scoring is done by topic area workgroup participants.
3. Workgroup "Designated Technical Expert" Testing of Materials: Each topic area workgroup has a *Designated Technical Expert*. Materials that pass the initial testing move forward for technical testing. These technical experts check materials for meeting the WCAG 2.2 Level AA requirements for the technical aspects of the scoring rubric (i.e., making sure the materials are built for accessibility), as well as the technical aspects within the learning content (i.e., teaching the correct information to learners).
    a. Designated Technical Experts are individuals holding highly specialized expertise. These individuals are:
        i. Validated as state experts in digital accessibility *technical* details, specifically at the new WCAG 2.2 Level AA standards for state government. The validation as experts occurs typically at the national or international level. This means that they hold a combination of both expert-level training and demonstrated applied expertise.
        ii. They are recognized individuals in supplying technical subject matter guidance for applying the WCAG 2.2 Level AA standards *in state government work*, meeting Washington State and Federal regulations requirements and industry best practices.

Table of Contents

1. Their expertise goes beyond personal lived experience, Section 508 Trusted Tester criteria, or general understanding or expertise of accessibility or digital accessibility.
2. These individuals are able to easily navigate WCAG success criteria techniques, readily identify when a technique does or does not qualify as an equivalent alternative under the WCAG, state, *and* federal requirements, and accurately explain alternatives for fixing accessibility issues to programmers and general laypersons alike.
3. Designated Technical Experts for Digital Accessibility in Government are *also* recognized digital accessibility experts. However, *not all digital accessibility experts meet the criteria for Designated Technical Experts for Digital Accessibility in Government*.

4. Usability or User-Testing of Materials: Materials that pass topic area workgroup initial and technical expert testing move forward for useability testing, also called User-Testing. In this project, User-Testing is done by volunteer state staff who do not know digital accessibility or the topic area details. This testing checks if the materials actually teach staff what they need to learn. It specifically checks if the knowledge and skills that the materials are trying to teach actually provide staff with that knowledge and skill-building / upskill employees.
    a. User-Testers provide sample products they create and ones provided to them to test for accessibility, as part of the process to ensure the materials teach staff what they need to learn, and provide staff with the skills to both create and test for digital accessibility.
    b. Feedback sessions are also done virtually with User-Testers to review the process they followed to create or test their samples, using screen-share, making sure the processes that were intended are what learners actually were able to learn from the training and resource materials.
5. User Experience or UX Testing of Materials: Materials that pass all prior testing move forward for user experience or UX Testing. In this project, UX Testing is done by volunteer state staff who are individuals with disabilities and who use digital assistive technology (digital AT) as part of their daily life. These are the individuals who need digital accessibility in order to have equal access and ability to participate in things involving technology. These are the individuals who have "lived experience" needing digital accessibility.
    a. This Project models *prioritizing* the *critical feedback* from *individuals with "lived experience"* before considering *any* accessibility testing as complete. The accessibility testing must be *checked by the individuals* with the *specific disabilities that are impacted* if accessibility is *not present* or *does not meet* their *needs*.
    b. This Project recognizes that many individuals with various disabilities also hold "lived experience" for general accessibility needs. This is why the Project made sure individuals in this general category were included in each of the topic area workgroups, to assist in guiding the review and creation of training and resource materials.
    c. The UX Testing volunteers are *only* asked to test materials which are already checked and "should" meet digital accessibility requirements, to *prioritize their critical feedback*.

Table of Contents

6. Audit Testing of Materials: Materials that pass all prior testing move forward out of the topic area workgroup level and up to the Digital Accessibility in Government / EO 24-05 Core Group for audit testing. This testing is done by two Core Group members: an eLearning / learning objectives tester (one of the state agency or state organization representatives for the Core Group) and a Designated Technical Expert from the Core Group.
    a. The audit done by the Core Group member who is a representative for a state agency or state organization completes an audit to check that the materials meet the learning objectives for that Primary Topic Area.
        i. This includes auditing for covering the information for that Primary Topic Area's subtopics (or "detailed topic areas" within the Primary Topic Area), as well as the essential elements for the detailed topic areas that are covered in those materials.
    b. The Designated Technical Expert from the Core Group does the technical Accessibility Audit testing. This Technical Expert is not the same person who did the Designated Technical Expert testing at the workgroup level, though both are Designated Technical Experts for this effort. This tester validates the earlier technical testing, while conducting the Accessibility Audit.
    c. Following this as a final testing step allows confidence by all state agencies and organizations to know that each of the Digital Accessibility in Government / EO 24-05 training and resource materials are double-validated to meet learning objectives, accurate teaching of digital accessibility for state government, follow accessibility requirements at the State and Federal levels, and other related requirements (such as Plain Language Guidelines and aligning with the state Equity and Digital Equity efforts).
7. Approved Materials made Available to All Staff: Once training and resource materials pass the audit testing, they are made immediately available to all state staff, where possible. Materials will be added to the Washington State Disability Inclusion Network (DIN) Business Resource Group's (BRG) website: Home | Disability Inclusion Network BRG, and where possible, the state learning system will link to these source materials to allow agencies to track their staff's training.
    a. Materials that cannot link to the source materials will be duplicated and maintained current *also* in the state learning system, for agency tracking of staff training. Both DIN and Department of Enterprise Services (DES), who administers the state learning system, are committed to making sure that both locations remain aligned and that materials are kept current.

Table of Contents

Table of Contents

Table of Contents

Table of Contents

Base Foundational and New Materials

Overview, General Information, Communications and Motivation

What is Happening, Why Now, What's Required from Government?

Federal Rules and Deadlines on Digital Accessibility for All State and Local Governments

- High Level Overview: National disability rights history was made in early 2024 with three new federal rulings about digital accessibility.
- The new rules require all public-facing and most internal digital content, and the systems, tools, sites, and applications (apps) holding that content to become accessible.
    - This impacts all state employees who interact with a digital device in the course of your position duties, not just IT professionals. Digital devices are things like computers, laptops, tablets, smartphones, etc.
- The rulings include new requirements for what is considered digitally accessible.
- Deadlines for full digital accessibility across state and local government *rapidly approaching*.
    - 1st deadline: April 24, 2026 for Public-facing / External Information:
        - Websites
        - Mobile Applications (apps)
        - All content in websites or mobile apps.
            - State agencies, state organizations, and offices of the state (a.k.a. state agencies) are all held to this deadline.
            - If information is publicly available and can be accessed by using technology (computers, laptops, smartphones, tablets, etc.), then the information, where it is hosted, and anywhere the agency provides access to that information publicly (website, portal, mobile app, etc.) must be made digitally accessible by the April 2026 deadline – with *very few* exceptions.
            - This includes online sites or applications the agency provides to individuals in the general public, such as clients, volunteers, service providers, etc., if those individuals are allowed to download or share that digital information.
            - No extension process or waiver available!
                - Smaller local governments who have populations of less than 50,000 people, such as counties or cities, have until April 26, 2027. That additional year is *not* available to Washington State agencies.
    - 2nd deadline: May 11, 2026 for nearly all *Internal*-facing Information (*only two weeks later!*):
        - Impacts agencies that receive *any* amount of federal funding – not *only* the agencies receiving financial assistance from the U.S. Department of Health and Human Services (DHHS) or the state agencies participating on the Washington State Health and Human Services (HHS) Coalition.

Table of Contents

        - If the agency receives *any* Federal department or agency funding at all, and that agency has at least 15 employees, including part-time, temporary, or seasonal employees, it's *required* to meet this *May 11, 2026* deadline.
        - Impacts the entire agency, even if only one small division, team, or staff member within that agency receives the funding.
        - Nearly all internal digital content and the technology that holds that information, including all places where that information can be accessed by any state staff, must meet the new digital accessibility requirements.
    - 3rd deadline is specific to State of Washington: July 1, 2026 for all "covered technology" in Washington State government:
        - Impacts all Washington State agencies.
        - Covers *all public-facing* and *nearly all internal* digital content and the technology that holds that information, including all places where that information can be accessed by state staff.
        - New State digital accessibility requirements one version *above* the highest of the current federal requirements.
            - This helps State of Washington provide better digital accessibility and to maintain that accessibility over time.
- Additional requirements in these federal rulings, related federal laws, and State policies, standards, and laws. Later modules break these down and provide more information about the intersections between them (i.e., connecting the dots).

New Era for Government Business

- We are being called upon to do work in a fundamentally new way.
- Public entities have a deadline for making our technology and digital content fully accessible – and keeping it that way.
- Accessibility is a civil right for the public and for our own staff.
- Think about when the Internet first came out, or when computers became household items. This is another leap forward in how we do work.
- We have made these technological advances in the workplace before – we can do it again!
- We're at the cusp of a new era of doing business. It's the right time, and the right thing to do.

What Does this Mean for State Agencies?

All technology, external digital content, and nearly all internal-facing digital content are impacted. The new federal and State requirements include details that content must be in plain language that meets the readability score of under grade 9 reading level. The technology and information in that technology includes (but is not limited to):

- Agency Websites (internet)
- Applications or Apps, including Mobile Apps
- Intranet
- SharePoint and SharePoint Online sites

Table of Contents

- Teams channels
- Emails
- Presentation materials
- Training materials
- Templates or forms
- Final work product saved digitally
- Other covered technologies.

Washington State's Commitments to our Citizens

- Overview of WA State's Commitments to our Citizens: Why We Do What We Do – Motivational video topics covering basic disability rights, history, and Washington-specific details.
- Executive Order 24-05 (EO 24-05): Purpose
- EO 24-05: Details / Breakdown
    - What is Required at the State Enterprise Level, From Which Group, and By When
    - What is Required of State Agencies and By When

Intersections of Digital Accessibility Requirements Across Federal and State Requirements

Americans with Disabilities Act (ADA) Basics

- Americans with Disabilities Act (ADA) is a national mandate to eliminate discrimination against individuals with disabilities. It provides Civil Rights specifically for people with disabilities within the United States. It went into effect in 1990.
- State and local government agencies are specifically held to requirements of providing equity across all services, programs, and activities for people with disabilities. All areas of the ADA hold some direct impact to state and local government. However, there are three primary areas of the ADA that are necessary for all staff to have basic understanding of digital accessibility requirements for government.
- ADA General Overview: Titles I, II, and Intersections with Title III
    - ADA Title I: Covers Employment for businesses that typically have 15 or more employees (including part-time, temporary, or seasonal employees). This includes State and local government employees.
    - ADA Title II for Government: Covers Public Entities, primarily State or local government.
        - Requires equity in all services, programs, and activities provided by state or local government.
    - ADA Title III: Public Accommodations and Services by Private Entities.
        - Intersects when vendors and contractors provide services, goods, or activities for state and local government's business. This can happen in a few different ways.
            1. The vendor or contractor provides goods, services, or activities directly to the public, acting as a proxy for the government agency. This means that the vendor or the contractor works directly with the people that the agency serves, to provide that agency's goods, services, or activities.

Table of Contents

        - It can be something like the contractor providing the service that the agency oversees, such as a state facility that is run by a contractor, or a state activity that the vendor hosts and provides the activities. It can even be a vendor supporting the website that the agency uses to communicate to the public or receive applications.
        - These are situations where the contractor or vendor is an ADA Title III business that is also held to the responsibilities in ADA Title II, because it is providing goods, services, or activities as if it is the state or local government agency.
    2. The vendor or contractor provides goods, services, or activities *indirectly* to the public, supporting the government agency to run its agency business. This can be things like providing: general office supplies, software or computer systems that all employees use to conduct the agency's business, facilities rented by the agency for staff to work in, technical or business management consulting services for the agency, etc.
        - These are situations where the contractor or vendor is an ADA Title III business that is also held to the responsibilities in ADA Title II, because it is providing goods, services, or activities that help the state or local government agency provide the agency's services, activities, or programs to the public.
    3. The vendor or contractor provides goods, services, or activities for a reasonable accommodation for employees with disabilities. Reasonable accommodations for employees decreases or gets rid of the workplace barriers to that employee with disabilities having *equal access* to do their work or participate in workplace activities (including virtual activities) that employees without disabilities have. This can be things like the vendor providing software that reads aloud the text on a screen for employees with low vision or who are blind, or a contractor providing Sign Language interpretation during a work meeting for an employee who is Deaf or hard-of-hearing to meet with a client. There are many examples of reasonable accommodations which government contracts or uses a vendor to provide.
        - These are situations where the contractor or vendor is an ADA Title III business that is also held to the responsibilities in ADA Title I, because it is providing goods, services, or activities that help the state or local government agency provide *equal access* to the agency's employees.
- Under Title II of the Americans with Disabilities Act (ADA), state and local governments are required to give people with disabilities an equal opportunity to benefit from *all* of their programs, services, and activities.
    - This includes public education (schools), public transportation, recreation, health care, social services, courts, voting, emergency services, public facilities like state offices, etc.

Table of Contents

- Under Title I of the Americans with Disabilities Act (ADA), employers with 15 or more employees (including part-time, temporary, or seasonal employees) are prohibited from discriminating against qualified individuals with disabilities in job application procedures, hiring, firing, advancement / promotion, compensation, job training, and other terms, conditions, privileges, and benefits of employment. State and local governments are specifically included as employers who must follow Title I.
    - The ADA term "discriminate against a qualified individual on the basis of disability" includes, "limiting, segregating, or classifying a job applicant or employee in a way that adversely [negatively] affects the opportunities or status of [the] applicant or employee because of the disability [that person has]." It also includes, "not making reasonable accommodations to the known physical or mental limitations of an otherwise qualified individual with a disability" with rare exceptions.
- The ADA also includes the requirement that state and local government must communicate with people with disabilities *as effectively* as communicating with others.
- Equal Access versus Equivalent Access:
    - Equal access as a Civil Right for people with disabilities means that they must receive the same level of access, *in the same timeframe*, without extra requirements, as people without disabilities have. This applies to access to:
        - Government services, programs, and activities.
        - The same privileges, terms, conditions, advancement, compensation, training, opportunities and benefits of employment, freedom from limiting, segregating, or classification in a way that negatively affects opportunities or status with employment, including as job applicants, and access to reasonable accommodations to reduce or eliminate barriers to employment for the disabilities known by the employer.
        - Communication that is as effective as those without disabilities.
        - Equal Access as a Civil Right means that government and employers *do not have the luxury* of making something accessible *only* if it is requested by an individual with disabilities. If it can be made accessible from the start, or before it is shared with or available to access by individuals who do not have disabilities, then it *must* be made accessible before sharing or making it available to access for anyone.
            - Standards of Basic Accessibility are detailed in the Americans with Disabilities Act. These standards apply to state and local governments, employers with 15 or more employees, businesses open to the public, commercial facilities, transportation providers, telecommunications companies, and others.
        - Additional federal and state laws also set this requirement, and include additional groups held to these standards.
    - Equivalent Access applies to situations where *equal* access *cannot* be done or does not meet the unique needs that an individual with disabilities requires. In these situations, people with disabilities, or the individual with disabilities, must be provided a similar or

Table of Contents

identical interaction, service, or content in a form that is equal in value (worth), *timeliness*, and result that individuals without disabilities have access to and experience. Equivalent access means that it is an *equally effective alternate*.
    - State of Washington also follows an Equivalent Access definition that is specific to information technology.
- Equal access with *digital accessibility* in government is now considered part of the *civil rights* for people with disabilities in the United States. Similar rights exist in most developed countries around the world.
    - Equal access is the standard for the federal laws. There are very limited situations where *equivalent* access is allowed.
- Equal Access and Equivalent Access both require the same *timeliness* for access by individuals with disabilities. This means the effort to make things accessible for the majority of people with disabilities must occur when designing and creating things. This idea is a large part of why there are new federal and state requirements for accessibility. In the view of federal and Washington State government:
    - Waiting until accessibility is requested means requiring individuals with disabilities:
        - To be limited in their access while others are not;
        - Take added time, energy, effort, *and* go through extra processes that are not required by individuals who do not have disabilities;
        - Share personal information when those without disabilities are not required to have their personal information shared in order to get access;
        - Never have the same opportunity for immediate access that those without disabilities have;
        - Always be treated differently when trying to access the same things as those without disabilities.
    - Waiting until accessibility is requested to provide basic accessibility means participating in discrimination, segregation, and denying others their Civil Rights.

2024 ADA New Rule for State and Local Government

In early 2024, the ADA was updated to specifically require that state and local government communicate with people with disabilities *as effectively* as communicating with others when technology is involved. The new rule includes all state and local government websites and mobile applications (apps) – or public-facing digital content and the IT hosting that content. It sets the standard for digital accessibility at the Web Content Accessibility Guidelines (WCAG) version 2.1 Level AA (or WCAG 2.1 Level AA standards).

- Details of what the new rule requires for all state and local governments (Title II).
    - Clarifies that equal access to state and local government services, programs, and activities *includes* any of these being provided or offered to the public *through* the web and mobile applications (apps).
        - Details that these requirements also cover any organizations that contract with state or local government agencies to provide public services.

Table of Contents

- Makes clear to state and local governments that the ADA requirements already set these standards and gives further clarification for these government agencies to understand how to meet the ADA obligations required for *equal access* to government services for individuals with disabilities.
    - Clarifies that state and local government agencies already have existing accessibility obligations for other types of technology that cover the services, programs, or activities offered under Title II (including for kiosks) and for state and local government employees under Title I (for technology and digital content employees use internally).
- Federal attorneys guidance on "population" for state and local government sizes to determine which of the two deadlines apply:
    - Example of school district is used. A school district is not considered a special district government. If it is a city school district, the population of the city is what the Federal government uses to determine that city's compliance date. If it is a county school district, the population of that county is what's used instead.
    - Similarly, city policy departments follow the city's population number. County libraries follow the county population. A local government organization that crosses multiple cities or counties, like a library system that covers 3 counties, or a Board that covers 5 regions, uses the total population of those three counties or 5 regions, respectively.
    - This helps understand why even small state agencies, state organizations, or offices of the state do not use the population of the direct individuals they serve, and instead are held to the state population size. This is why all state agencies, organizations and offices have the same deadline of April 24, 2026.

- Breakdowns of the requirements in the rule.
- Federal information of Title I requirements already covering state and local government employees and job applicants having equal access in the workplace, including digital content and the technology where that content is used or accessed.
- Exceptions to the ADA rule – 5 specific exceptions from compliance:

A. Archived web content.

- This is specifically defined by the ADA rule to mean that it is web content that meets *all four* of the following criteria:
    1. Was created before the date that the public entity is required to comply with the rule *and* reproduces paper documents that were created before the date the public entity is required to comply *or* reproduces the contents of other physical media (for instance, something like digitally scanning a physical photograph) that was created before the date the public entity is required to comply with the rule.
        - An example of reproducing paper documents created before the compliance date are scanned meeting notes or prior research papers that are provided on an agency website for public access.

Table of Contents

- Even if these documents do not need to be updated for the new accessibility requirements, public entities are still held to the standard of providing equal access in the same timeframe as those without disabilities can access the documents. This is where good planning to make sure there is an accessible equivalent available for all public content is critical for each state agency.

and

2. Is retained exclusively (only) for reference, research, or recordkeeping.

and

3. Is not altered or updated after the date of archiving.
    - There is an auto-save feature in many materials that most state employees keep on or do not notice. When that auto-save is on your documents or other content that can be used publicly, then every time you open the document to reference it, the system creates an updated version the next time it auto-saves. This can happen moments after you open the document, unless you turn off those settings for documents being kept only for reference. If a document is considered archive under the federal rule, and you open that source document with auto-save on (and do not quickly disable that feature), then you have just created an updated version in the system that must then comply with the digital accessibility requirements. This occurs also in Outlook and shared documents that are not set to "view only" in Teams channels or SharePoint Online. When those are the "source" documents for content used for a website or mobile app, it can be easy to fall out of compliance with the federal rule unless actions are taken by employees to turn off the auto-save setting and features (many Microsoft products have this display in two separate places, both of which may need to be disabled to prevent auto-saving as a new version to occur).

and

4. Is organized and stored in a dedicated area or areas clearly identified as being archived.
    - The date that Washington State government must comply with the rule is April 24, 2026.

B. Pre-existing conventional electronic documents, unless the documents are currently used to apply for, gain access to, or participate in the public entity's services, programs, or activities.

Table of Contents

- Conventional electronic documents is specifically defined in the ADA rule to mean web content or content in mobile apps that is in the following electronic file formats only: Portable Document Formats ("PDFs"), word processor file formats (such as MS Word), presentation file formats (such as MS PowerPoint), and spreadsheet file formats (such as MS Excel).
- Pre-existing conventional electronic documents has the additional explanation that these are conventional electronic documents that are available as part of a public entity's web content or mobile apps before the date the public entity is required to comply with this ADA rule, unless the document is currently used to apply for, gain access to, or participate in the public entity's services, programs, or activities.

C. Content posted by a third party, unless the third party is posting due to contractual, licensing, or other arrangements with the public entity.
   - This means that the content a vendor or contractor puts on their own site or apps that are not done as part of their contract with or purchase from the state or local government agency are not things the state or local government agency needs to have following these federal requirements. For instance, the state often uses YouTube channels or licenses for publicly posting information. The state is responsible for the content and format for channels the state manages or provides, but is not responsible for the ads or other content that is on YouTube and not part of what the state purchases from them. A vendor may create an app for a state service, program, or activity and that app and the content in it is required to meet the federal requirements. But the website that vendor manages for conducting the business it owns, and that is not part of any state license, contract or other agreement is not the responsibility of the state.

D. Conventional electronic documents that are about a specific individual, their property, or their account and that are password-protected or otherwise secured.
   - This is further defined by the federal rule to clarify that this content needs to meet both of the following in order to quality:
     1. About a specific individual, their property, or their account and
     2. Password-protected or otherwise secured.
   - The federal government provided clear instructions that these are for individual conventional electronic documents that meet both criteria, and cannot be used for entire groups of document or generally for password-protected online or mobile app technologies.

E. Pre-existing social media posts.
   - This is further defined to be a public entity's social media posts that were posted before the date the public entity is required to comply with the new federal rule.

Guidance for all staff on material that meets "archive" definitions under the federal rulings

- Details about the different definitions for "Archive" that apply:
  - Definition of "archive" in the 2024 ADA ruling

Table of Contents

    - Definition of “archive” in the 2024 Section 504 of the Rehabilitation Act ruling (different from the ADA definition)
    - Washington State Records Management definition of “archive”
- State guidance to all staff of how to:
    - Audit for digital content meeting the ADA archive definition,
    - Label or rename the content to clearly indicate it is archive under the ADA,
    - Place in a location clearly indicating it meets the ADA archive exceptions, and
    - Apply a retention label.
- Guidance to all staff about the auto-save features in their digital tools that create “new” or “updated” versions
    - Materials with new or updated versions will not meet the federal requirements as “archive” after April 24, 2026.

Washington State Digital Accessibility Policy (USER-01) and Standard (USER-01-01-S)

- Explaining what each of the sections for the policy and the standard mean for state staff.
- Guidance or best practices for applying the policy and standard into everyday work.
- Guidance for state agencies for meeting the updated policy and standard.

Federal Health and Human Services (HHS) Requirements Connected to Digital Accessibility

Section 504 of the Rehabilitation Act

- The Rehabilitation Act of 1973 prohibits discrimination on the basis of disability in programs and activities that receive Federal financial assistance, as well as programs and activities conducted by any Federal agency. It defines the rights of individuals with disabilities to participate in and have access to program benefits and services.
    - Federal financial assistance is noted in the law to mean any grant, loan, contract, cooperative agreements, subgrants, or other arrangement that provides or makes available federal assistance in the form of funds, services of federal personnel or real and personal property.
- Rehabilitation Act of 1973 added the section 504 regulations in 1977.
    - It applies to employers and organizations that receive financial assistance from any Federal department or agency, including the U.S. Department of Health and Human Services (DHHS).
        - These organizations and employers include many hospitals, nursing homes, long-term care facilities, mental health centers, and human service programs.
        - The entire organization or employer is impacted if any part of the organization or employer’s business, or any program, or activity run or managed by that organization or employer, receives any financial assistance from any Federal department or agency.
    - Requires organizations and employers provide an “equal opportunity” to receive program benefits and services.
- In early 2024, Section 504 was updated to clarify, modernize, and strengthen the regulation. Updates included digital accessibility requirements, among many other detailed requirements.

Table of Contents

- Section 504 digital accessibility updates involve “web, mobile, and kiosk accessibility.” It applies to the organizations and employers all programs or activities that receive Federal financial assistance. It sets the standard for digital accessibility at the Web Content Accessibility Guidelines (WCAG) version 2.1 Level AA (or WCAG 2.1 Level AA standards).
    - It impacts digital information that is both internal and external.
    - There is a nuance with how “web content” is defined in this rule. This nuance was clarified by later guidance issued by the U.S. Department of Health and Human Services (DHHS) who issued the new rule.
        - Web content under this rule covers nearly all digital information that is controlled or managed by employers and organizations who are required to follow the Rehabilitation Act requirements. This means it covers nearly all digital content, or information that is accessed, used or stored digitally, no matter if it is internal or public. It also includes the technology code or markup that defines the digital content’s structure, presentation, and interactions (also called macros or digital content metadata).
    - Examples of web content in the new rule include:
        - Text (or writing)
        - Images
        - Sounds
        - Videos
        - Controls (like links, buttons, and input fields (checkboxes, form fields that are used to enter information, etc.))
        - Animations (including GIFs and Emojis)
        - Conventional electronic documents (this rule uses the same definition for this term that is used for the Americans with Disabilities Act 2024 new rule: PDFS, word processor file formats, presentation file formats, and spreadsheet file formats)
    - Kiosks in this rule are “self-service transaction machines made available…at set physical locations for the independent use of patients or program participants.” Further details are provided that these often have a screen and keyboard, touch screen, or similar device for customers or patients to use for entering their information. These are often used for people to check in, provide information in order to receive services, get direct services, have their vital signs taken, or “perform other similar actions.”
    - Requirements for digital accessibility:
        - Kiosks must provide equal access to people with disabilities. Individuals with disabilities cannot be excluded from participation in, denied benefits of, or otherwise subjected to discrimination under any program or activity provided by that employer or organization through kiosks, based on the individual’s disability.
        - Digital Information (Section 504 definition of web content plus mobile applications) is required to be “readily accessible to and usable by individuals with disabilities.” This includes:

Table of Contents

        - Digital Information that the organization or employer provides or makes available, directly, through contracts, licenses (vendors), or other arrangements *and*
        - Mobile applications (apps) that the organization or employer provides or makes available, directly, through contracts, licenses (vendors), or other arrangements.
    - The date that Washington State government must comply with the rule is May 11, 2026. The same date also applies to other organizations and employers with 15 or more employees.
        - Two exceptions to compliance exists: The organization or employer must demonstrate that compliance would result in a "fundamental alteration in the nature of a program or activity" or "in undue financial and administrative burdens."
        - The federal guidance is that it will be quite difficult for any state or other large organization to be considered for meeting either of the exception requirements.
- Section 504 digital accessibility rule has a different definition for what meets "archive" web content than the one used for the 2024 ADA ruling. This applies to the Section 504 definition of web content (nearly all digital information) that meets all four of the following requirements – Web content that:
    1. Was:
        a. Created before the date compliance is required (May 11, 2026) *or*
        b. Reproduces paper documents created before the date that compliance is required *or*
        c. Reproduces the contents of other physical media created before the date compliance is required

    and

    2. Is retained exclusively for reference, research, or recordkeeping *and*
    3. Is not altered or updated after the date of archiving *and*
    4. Is organized and stored in a dedicated area or areas clearly identified as being archived.

Section 508 of the Rehabilitation Act and Section 255 of the Communications Act

- Section 508 is part of the Rehabilitation Act of 1973 that prohibits discrimination on the basis of disability in programs and activities that receive Federal financial assistance, as well as programs and activities conducted by any Federal agency. It defines the rights of individuals with disabilities to participate in and have access to program benefits and services.
- Section 508 of the Rehabilitation Act addresses "Electronic and Information Technology" and the development, procurement, maintenance, or use of it. It impacts digital information that is both internal and external.

Table of Contents

- Requires that individuals with disabilities who are employees have access to and use of information and data that is *comparable to* the access to and use of the information and data by employees who are not individuals with disabilities (i.e., Equal Access).
- Requires that individuals with disabilities who are part of the general public seeking information or services also have access to and use of information and data that is *comparable to* the access to and use of the information and data by those in the general public who do not have disabilities (i.e., Equal Access).
- Requires "*alternative means*" efforts when the development, procurement, maintenance, or use of electronic and information technology that meets the standards would create an undue burden, then the organization or employer must provide individuals with disabilities the information and data using an alternative means of access that allows that individual to use the information and data (i.e., Equivalent Access).
- Uses the term "Information and Communication Technologies (ICT)"
- The current Section 508 standard for digital accessibility is at a lower level than the new federal rules require. The standard is at the Web Content Accessibility Guidelines (WCAG) version 2.0 Level AA (or WCAG 2.0 Level AA standards).
- Section 255 of the Communications Act requires telecommunications products and services to be accessible to people with disabilities, to the extend that access is "readily achievable."
    - This covers all hardware and software telephone network equipment and telecommunications equipment used in the home or office (e.g., telephones, wireless handsets, fax machines including digital fax machines, etc.).
    - It also covers basic and special telecommunications services, like phone calls, call waiting, speed dialing, call forwarding, computer-provided directory assistance, call monitoring, caller ID, call tracing, repeat dialing, voicemail, interactive voice response systems that provide callers with menus of choices, etc.
    - If accessibility is not "readily achievable," products or services must still be made compatible with peripheral devices or specialized equipment if compatibility is readily achievable.
        - Peripheral devices are devices that help make telecommunications products and services accessible to individuals with disabilities. Examples include teletypewriters (TTYs), visual signaling devices, amplifiers, etc.
    - Network architecture also must be designed in a way that does not slow down or prevent access by people with disabilities, and covers things like the public telephone network, hardware and software databases associated with routing telecommunications services, etc.

Section 1557 of the Patient Protection and Affordable Care Act

- Prohibits discrimination in any health program or activity if any part of that organization is receiving Federal financial assistance ("including credits, subsidies, or contracts of insurance or is under any program or activity that is administered by … any entity established under" the Affordable Care Act).

Table of Contents

- In early 2024, Section 1557 was updated.
    - "Health program or activity" definition updated to include "any project, enterprise, venture, or undertaking to":
        i. Provide or administer health-related services, health insurance coverage, or other health-related coverage;
        ii. Provide assistance to people in obtaining health-related services, health insurance coverage, or other health-related coverage;
        iii. Provide clinical, pharmaceutical or medical care;
        iv. Engage in health or clinical research;
        v. Provide health education for health care professionals or others.
    - Also includes all of the operations of any entity where their primary business is to provide or administer any health projects, enterprises, ventures, or undertakings described by this law as a health program or activity, and specifically includes a State or local health agency, hospital, health clinic, health insurance issuer, physician's practice, pharmacy, community-based health care provider, nursing facility, residential or community-based treatment facility, or other similar entity or combination of these. This also includes, "all of the operations of a State Medicaid program, Children's Health Insurance Program, and Basic Health Program."
- Accessibility of information and communication technologies (ICT) for people with disabilities is included in this rule, including telehealth services. It also covers language access and other protections under federal non-discrimination law.
- Also requires compliance with the Rehabilitation Act sections, and sets the expectation the compliance is consistent with the Americans with Disabilities Act.
- Sets the *new* expectation that entities that must comply with Section 1557 designate a Section 1557 Coordinator for the organization and sets expectations of what that coordinator must provide for the entity. Coordinators were required to be designated, "Within 120 days of the effective date" of the rule. The effective date of the rule was July 5, 2024.

Titles VI and VII of the Civil Rights Act of 1964

- The Civil Rights Act of 1964 establishes relief against discrimination in public accommodations and sets constitutional rights in public facilities and public education, prevents discrimination in federally assisted programs, and establishes ways to enforce these rights.
- Title VI prohibits discrimination in federally assisted programs. It does not permit someone to be excluded from participating in, denied benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.
    - Not applicable to digital accessibility directly, though is used to strengthen how equal access is defined and used for the other federal laws around digital accessibility and nondiscrimination.
    - Program is defined in this law to include:
        - All of the operations of:

Table of Contents

        - A department, agency, special purpose district, or other instrumentality of a State or of a local government
        - Any part of a State or local government that distributes Federal financial assistance
        - Each department or agency or other State or local government entity that receives Federal financial assistance or where that assistance is extended from another State or local government entity
        - A college, university, or other postsecondary institution or public system of higher education
        - Any local educational agency, system of vocational education, or other school system
        - An entire corporation, partnership, or other private organization, or an entire sole proprietorship if Federal financial assistance is extended to that organization as a whole or if that organization is principally engaged in the business of providing education, health care, housing, social services, or parks and recreation
        - An entire plant or other comparable, geographically separate facility that Federal financial assistance is extended to, for any other corporation, partnership, private organization, or sole proprietorship
        - Any other entity that is established by two or more of the entities already listed.
- Title VII requires equal employment opportunity
    - Generally applies to employers who have 15 or more employees, or labor organizations, nonprofits, and employment agencies that have more than 25 employees.
    - Prohibits "unlawful employment practice" by employers that are considered discrimination.
        - Includes hiring, compensation, terms and conditions of employment, privileges of employment – including trainings and training programs, or any other limitation, segregation, or classification of employees or applicants in a way that deprives or tends to deprive someone employment opportunities or otherwise negatively affect their status as an employee because of the employees protected status.
        - Includes the requirement that employers cannot give or act on the results of a professionally developed ability test if the administration of the test or actions taken based on the results are designed, intended, *or* used to discriminate based on protected status. For instance, if the ability test is only given to females applying for a job, this is considered discrimination.
            - Ability tests are allowed by employers when they are designed, administered, intended, and used *equally*.
            - A common example with ability tests in State work are the tests taken at the end of a required training that is available virtually. If that training was not built for accessibility, then employees who have certain disabilities cannot

Table of Contents

take the required training or pass the knowledge test. This is considered discrimination.

Why Accessibility Matters

- Disability is part of the human condition
    - Individuals can become disabled at any time, in any population.
    - It is not age-specific, gender-specific, culture, race or nationality-specific.
- Inclusion for people of all abilities often results in equitable inclusion for all.

Diverse abilities

Many different types of disabilities.

- Recognizable Disabilities – Disabilities that others can readily observe (e.g., wheelchair users, individuals who are blind, Deaf individuals, individuals with dwarfism, etc.).
- Non-apparent Disabilities (a.k.a. "hidden" or "invisible") – Disabilities that others cannot readily observe (e.g., chronic medical conditions, cancer, brain tumors, mental illness, etc.)
- Temporary Disabilities – Disabilities that affect an individual for a brief period of time (e.g., broken bone, severe illness, recovery after surgery, etc.)
- Permanent Disabilities – Disabilities that are expected to continue for the rest of the individual's lifetime (e.g., loss of a limb, genetic disabilities, mental illness, chronic medical conditions, etc.)
- Age-related Disabilities – Disabilities common to older adults (e.g., decreased hearing, dementia, chronic back or neck pain, cataracts, etc.)
- "Web Disabilities" – Disabilities impacting ability to interact with the Digital World (e.g., individuals experiencing low-vision, color blindness, neurologic or atypical brain development or processing, tremors, hard-of-hearing, etc.)
- "Print Disabilities" – Disabilities impacting ability to interact with printed materials (e.g., individuals who are low-vision or blind, limited in ability to hold or manipulate information in a printed form, have perceptual, cognitive, or other disabilities which limit ability to follow a line of print or maintain concentration, etc.)

Accessibility Matters

- How an environment is set up impacts how well individuals with disabilities can access, navigate, and interact with that environment.
- Accessibility in the Built Environment:
    - Refers to how physical structures are constructed, like buildings, parking lots, streets and sidewalks, parks, playgrounds, etc.
    - Without things like elevators, electronic door openers, ramps, curb cuts in sidewalks, braille signs, etc., people with disabilities cannot access, navigate, or interact with physical spaces.
- Assistive Technology (AT): Technology used by individuals with disabilities that allow the person to do things that would otherwise be difficult or impossible for them to do.

Table of Contents

- Low-tech assistive technology (low-tech AT) refers to simple, often non-electric tools or devices used to assist individuals in performing daily tasks. Low-tech AT includes things like:
  - Wheelchairs
  - Communication boards
  - Pen grips
  - Magnifying glasses
  - Canes or walkers
  - Braille signs
  - Mouth sticks
  - Zipper pulls, etc.
- High-tech assistive technology (high-tech AT) refers to more sophisticated and includes digital or electronic components and functions. High-tech AT includes things like:
  - Speech recognition programs
  - Text-to-speech systems
  - Electronic door openers
  - Custom wheelchairs
  - Audio ticketing systems, etc.

Digital Assistive Technologies

- Digital AT is high-tech assistive technology specifically designed for interacting with information and technology, or IT, in the digital world.
- Digital Assistive Technologies "solve" some of the problems people with disabilities experience when interacting with the digital world.
- Digital AT is not solely for those who are Blind, Deaf, or DeafBlind. For instance, it is also used for:
  - Color blindness
  - Mobility disabilities
  - Developmental disabilities (both cognitive and intellectual)
  - Learning disabilities
  - Brain injuries
  - Mental health disabilities
  - Speech and language disabilities
  - Seizure disorders, and
  - Individuals with multiple / complex disabilities.
- Disabilities requiring Digital AT are equal. This means the needs of one particular disability for digital AT are not more "valid" or "qualified" than another's. For instance, the need for using captions for Deafness are just as valid and qualified as the need for using captions for ADHD.
- Common Digital AT examples:
  - Screen readers
  - Refreshable braille devices

Table of Contents

    - Screen magnifiers / enlargers: Zoom in to enlarge text and images when viewing a web page, email or document – zooms more than is typically available with the default computer settings
    - Color enhancement overlays or glasses
    - Captions
    - Transcripts
    - Alternative keyboards
    - Head wands / Mouth sticks / Eye gaze tracking
    - Voice activation: Talk to text and ability to control the device with only their voice
    - Augmentative communication aids (e.g., hearing aids connecting to sound system by Bluetooth).
- Digital AT *only* works if the technology and its content are built accessibly.
    - Digital AT only works when the digital content – the information accessed, used, or stored digitally – *and* the IT systems, tools, and platforms where that digital content resides are built accessibly. Otherwise, people with disabilities *cannot* access, navigate, or interact with that information.
        - You can have the best screen reader in the world for your disability, but it won't work if the document on your screen wasn't written to be accessible or it's in an IT system, tool, or platform that isn't accessible.

Impacts of Planning Fixes versus Designing with Accessibility in Mind

How an environment is set up impacts how well individuals with disabilities can access, navigate, and interact with that environment.

- Planning accessibility fixes means fixing how something is created to add-in accessibility *after* it is created.
- Designing with accessibility in mind means that before something is created, the person or people creating it *plan* for it to include accessibility as it is getting created.
    - Creating things can be as simple as: someone who is about to write an email, create a presentation slide deck, create an announcement flier, or update their work office space.
    - Or creating can be more complex like: a group designing a program, developing a website or mobile app, leading an organization's project, designing a division's new office space, planning a state's infrastructure.

Scenario(s) to help understand the general impact of planning accessibility fixes versus designing with accessibility in mind.

Built Environment Impact Scenario

A new office building tower is built in your area. It has many levels to it. The building design does not include accessibility and the developers tell people that if accessibility is needed later, they will find a way to add it to the office tower after it is built. This office building tower is built without:

- Elevators,

Table of Contents

- Designated parking spaces for people with disabilities,
- A ramp or curb cuts leading to the building's entrances,
- Automatic door openers,
- Signs in Braille,
- Side-by-side drinking fountains at two different levels,
- Doorways wide enough for mobility device users to go through, and/or
- Bathroom stalls and sinks built for people with disabilities.

Digital Environment Impact Scenario

A popular store builds an online presence and manages a mobile app that customers can use to get reward points, do their online shopping, and schedule for their shopping cart to either be delivered to them or ready for pickup at the time convenient to the customer. The app has many design features customers love, like saving favorite items, getting notified when items on backorder become available again, and even creating shopping lists and wish lists that they can share with others.

The store owners prioritize a fun, visually appealing design and plan to add accessibility features if these get requested later. In order to use any of the features, customers need to select different fields and sometimes enter their information or select a checkbox for the feature to work as it is designed. The company includes a field in their app to "request accessibility" to help them know if their users need any accessibility features. The store does not provide other options for their pickup or delivery services, directing customers to use the app if they want to use those services. Individuals with disabilities who travel to the store and share with staff the barriers to their access are told to use the app and if they cannot use it themselves, maybe they should, "find someone who can help you do it."

Government Digital Environment Impact Scenario

A state agency moved out of paper systems and into a digital one. The system now provides digital-only access for all of the agency's programs, services, and information. Public are directed to self-serve options on the agency's system, and must navigate these to locate information about how to contact a live person for any assistance or accommodations.

All of the agency's publicly-available content, including newsletters, forms, program details, etc., must get accessed through their digital portal. This takes users into the agency's system. The agency is credited with streamlining their services and decreasing wait times in a cost-effective and efficient approach. All staff use the internal version of the agency system for conducting the agency's business, as well. Staff are told they don't need to worry about accessibility for the documents and other content they create digitally, *unless* someone makes a request for accommodation.

Agency executives and the developers of the agency system decided that accessibility was not a priority, given their tight resource constraints. They determined that they could always create an "alternative equivalent" if a request was made for one.

- Does the public have ability to request accommodations for accessibility, when requests can only be made through the agency system that was not built for accessibility?

Table of Contents

- Does the public have "equal access" or "equivalent access" to all of the programs and services that agency provides?
- Can someone who requires screen reading technology to "read" digital content easily apply or work for that agency, the same as or equal to a person who does not need that technology?
- Which do you think costs more in time, staff resources, and budget: updating the entire system to add-in accessibility fixes for the entire agency system? Or designing the agency system for accessibility at the start?

How do Fixes vs. Designing for Accessibility Impact State Government

- Equal access as a Civil Right sets the expectation that people with disabilities must be able to access the same things as people without disabilities, *in the same timeframe*.
    - This can get forgotten when it *seems* faster or cheaper to create, purchase, or contract for something that was created without accessibility.
    - If the state or local government decides to use something that was created without accessibility, they still *must* make sure to give *equal access* and provides that accessibility. If equal access cannot be provided, they are responsible to provide *equivalent access*. This is also called an "accessible alternative" or an "equivalent alternative." That alternative is required to get provided *within the same timeframe* that the version that is not accessible or not fully accessible is provided.
        - Equal access applies to both the built environment and the digital environment.
        - Built Environment Example – Not Providing Equal or Equivalent Access: The state rents an office building with stairs. There is no ramp and no entrance doors that can be easily opened by someone in a wheelchair, someone using a cane or walker, someone with hand tremors, someone without arms, and someone who is a different size than most adults. The office is the only location within 100 miles that general public can apply for a particular state program, service, or activity. Staff decide that they will come up with an alternate way for public to apply *if* they are asked for an accessible option. General public are able to apply for that program, service or activity. The office receives a call, during business hours, by someone with a disability asking what alternative is provided for people who cannot enter that office building. Staff tell them they will work on creating an alternative and the person can call back in maybe a week or two to find out what that alternative will be. Equal access is *not* being provided, equivalent access is *not* being provided, and that agency just denied the civil rights of the caller.
        - Digital Environment Example – Not Providing Equal or Equivalent Access: A state agency purchases licenses from a private business vendor to host their new web platform. They do not check that the platform is designed to meet digital accessibility requirements. General staff at the agency write the documents, newsletters and web content that their IT web developers put up on that website. They also create informational videos that use audio (sound) and video images, and work with a contractor to provide podcasts. The staff are not trained to create their

Table of Contents

content to meet accessibility requirements. They are also not trained in how to check a contractor provides accessible content, and take the contractors word that it "meets accessibility." The web developers have basic Section 508 training and can access the online Web Content Accessibility Guidelines. However, they do not have training specific for how to fix accessibility in documents, videos, or the audio podcasts. They use automatic checkers to test accessibility and feel this is enough to meet requirements. An individual who is DeafBlind tries to access the website for information about applying for services. They were told that services can be applied for online, which is true for those who do not have disabilities. There is very little on the entire agency website that they are able to access using their assistive technology. Equal access is *not* being provided, equivalent access is *not* being provided, and that agency just denied the civil rights of that individual who is DeafBlind.

  - Additional scenarios as developed, to continue demonstrating planning fixes versus designing for accessibility impacts to state government.
  - Reminder: State and local government must still provide equal access if it is possible, and equivalent access if it is not. Things created without accessibility still require access for people with disabilities in the *same timeframe* as people without disabilities have. State and local *government does not have the luxury of waiting until* someone makes the request for an accessible version before starting to work on an accessibility version.
    - Situations where an individual with disabilities unique needs require more than basic accommodation do allow for reasonable time to accommodate those unique needs. However, this is only for situations where the needs are *different* or *more than* what is part of *basic accessibility* requirements for employers, state, and local government.
  - Address when there are valid reasons that something is created without accessibility. For instance, when legal or technical requirements prevent an equal access version in the original product. These are situations that still require equivalent access get provided. That equivalent access cannot wait until a request is made for an accessible version, however.
- Often, the appearance of faster or cheaper is based *only* on the direct cost of that item. It *rarely considers* the costs to do a fix later, or to build an alternate version that meets the same purpose and is accessible, including time and resources for staff and possibly contractors or vendor costs. It also rarely considers the likely legal costs from denying individuals with disabilities their Civil Rights and promoting discrimination of a protected class of individuals.
  - It can also get forgotten when there is only one option available and it is not an option that includes accessibility. This still requires development of an equal access or equivalent access version that needs to be shared at the same time as the inaccessible version.
  - Planning to do a fix later *creates* risk and cost that would not exist if the government agency made sure the thing was designed for accessibility. If state or local government waits until a request for accessibility is made, they cannot claim equal or equivalent access. It also often takes more time and resources to develop an accessible version or fix for

Table of Contents

accessibility after something is already created, than it does to include accessibility in the planning and creation of that thing.

- This is like having a 20-story office tower that you planned and built without an elevator.
- Adding an elevator only when a request is made doesn't provide the people who need it the equal and immediate access that someone who can walk up 20 flights of stairs already has.
- Building only to meet an accessibility request is like adding that elevator, but having it only go to the 10th floor because that is the level the person with disabilities needs for their request. It does not give equal access for a job applicant with disabilities who is scheduled to interview on the 20th floor a week later.
- Building with the elevator as part of the plan and development of the building gives everyone equal access as soon as that building opens.
    - Vendors who need to haul heavy, large office equipment like a commercial printer, desks, file cabinets, etc. will use that elevator, even though they are strong and not individuals with disabilities.
    - Parents with strollers, bringing their small children with them in a stroller to apply for services on the 15th floor will use that elevator, even though they are young and not disabled.
    - Staff who have no desire or time to walk up 5, 10, or 20 flights of stairs, who are carrying their work documents, lunch, personal accessories, and coffee or tea will use that elevator, no matter how able or young they feel.

- State and local government is required to follow the accessibility laws for the built environment and for the digital environment.
- Checking for accessibility:
    - Most of the federal laws for accessibility, and the state Digital Accessibility Policy require an accessibility point of contact (or coordinator) who is responsible to coordinate their efforts to comply with the different requirements (e.g., ADA Title II coordinator, Section 504 coordinator, Section 508 Program Manager, Section 1557 Coordinator, and the Washington Technology Digital Accessibility Policy's IT Accessibility Coordinator required for state agencies). This means that state government should have many employees who are responsible for some part of accessibility in their agency. However, there are not standards for that person having a particular skill set, knowledge base, or training and experience to hold this role.
    - Agencies can get in the practice of only having an agency accessibility point of contact test their design or product – in either the built environment or the digital environment. If that person is not trained for that exact thing, and is not an individual with disabilities that will be *impacted* if the design or product is *not* accessible, testing should *not* be considered complete.

Table of Contents

- Things can appear to meet accessibility requirements and still not be accessible for the group(s) that are most impacted by that thing not getting built or produced to meet their needs.
    - Example 1 – Built Environment: A large medical office is the length of one city block. The front entrance is at street level, with no steps or barriers and uses electronic doors for access. Most of the doctor offices are at the other end of that building, over 200 feet from the entrance. The parking stalls for individuals with disabilities are clustered by the back entrance, which uses a ramp and a door that requires the individual to pull open with some decent amount of strength. The facilities designers set up the "lobby" where that back entrance opens to be the staff-only break room. The back entrance can only be opened using a badge scanner in addition to the strength needed to open the door. The door that requires the individual to pull it open cannot be opened by an individual in a wheelchair or using a walker, since they would have to reach too far, over their wheelchair or walker, to grasp the handle. The building structure meets technical requirements for the Americans with Disabilities Act. However, the design and use of the accessibility elements make it impossible for someone with the disabilities who needs those accessibility features to ever enter that building by themselves. Their independence to access the building or navigate inside of it requires that they are physically able to do things that their bodies are unable to do. The facility and the interior use design were both approved by that facility's first ADA coordinator, who was a person who does not have disabilities, and more recently updated approval was provided by their second ADA coordinator, who does have a disability though it is one that does not impact their physical access.
    - Example 2 – Digital Environment: An agency shifts their application process to allow a self-service digital experience that is available online and on kiosks located in their buildings' lobbies. They have a Section 508 coordinator run testing for digital accessibility. The tester follows the Section 508 requirements listed for the Web Content Accessibility Guidelines version 2.0 Level AA (WCAG 2.0 AA). They do not have the knowledge, skill, or experience to test to the new federal and state requirements and let their people know that it passes for digital accessibility. They also do not have technology to test if it works for screen readers or keyboard users. An individual with disabilities who uses a screen reader and keyboard to read digital information out loud also only speaks and reads Mandarin. They try to use the online site to apply for services. The content that their screen reader is able to interact with skips over important sections and fields of the application form that they are required to answer. The site content is also not written to meet Plain Language standards for Digital Accessibility. The Mandarin alternate of that website does not make logical sense, since many of the areas of that site do not work for keyboard users and are not built for a screen read to "read" them. The translation the individual hears is based on the website information that did not use Plain

Table of Contents

Language, and relies on many English legal terms that are unknown to that individual. The individual cannot use the website with equal access, even though it met Section 508 technical requirements when the coordinator looked over it.

In state government, you can build wonderful digital content and tools like: documents and presentation decks, web or intranet sites, Teams channels, SharePoint sites, meeting collaboration white boards, IT systems, tools, platforms or applications (apps), etc.

But if it is not built for digital accessibility, then people with various disabilities *cannot* access, enter, navigate or use that digital content, no matter how hard they may try.

Creating materials that are accessible from the design planning phase provides the easiest and most effective approach to accessibility. Fixing things that are already built, including documents that were developed without accessibility in mind, takes the most time, money, and effort and often are quite difficult to fully meet accessibility requirements. It is very similar to building that high-rise building with no elevator, then "planning" to find a way to add-in an elevator only if someone asks for it.

Disability and Poverty

- Understanding connection of disabilities and poverty.
    - Statistics of individuals with disabilities in the world, nation, and Washington State.
    - Statistics of unemployment and under-employment for people with disabilities.
    - State of Washington goals for state employees with disabilities (breakdown of EO 24-05, EO 24-04, EO 22-02, and EO 21-01 specifically for employees with disabilities).
        - Current statistics of Washington State employees with known disabilities (OFM public data of state employee demographics for employees with known disabilities, and where possible, OFM data of disability demographics for job applicants for state employment) – For understanding of how much progress is needed to meet state goals.
- Impact for access to government services and supports (for both general public and for state employees who also qualify for government services and supports): Often a matter of life and death – the literal ability to survive.
    - Drives home the criticality for government services and supports to be accessible, including digital accessibility. Digital accessibility is particularly vital for those who have additional barriers like transportation, housing instability, sole caregiver for family members / dependents, working multiple minimum-wage jobs / living significantly below poverty line, medically homebound or otherwise fully incapacitated, limited access and time for travel to the nearest state office needed, survivors of violence, etc.

Accessible Design / Universal Design / Human-centered Design means Access and Accessibility for ALL

- Everyday use of universal designs by able-bodied individuals: Curb cuts, Elevators, Electric or Auto-opening doors, Ramps, Dual-height drinking fountains, etc.

Table of Contents

- Cost savings avoiding building something twice over building it accessible and usable for all, once, or fixing something twice over fixing it for access and use by all (e.g., shoveling and de-icing stairs before doing the same for the ramp, when taking care of the ramp would allow all to use and access facilities faster; spending hours fixing a document or creating an equivalent alternative rather than building it accessibly from the start, etc.).
- Designs are what "disables" people: Creating barriers for access and use that wouldn't exist if designed with accessibility in mind. Shifting approach in state government to incorporate accessibility at the start of the creation planning, not at the end – avoids being left "fixing" or creating an equivalent alternative as a second process.
- Creating for access and accessibility for all provides equity – or equal access – from the start.
    - Designs for maximum functionality – Meeting the needs of individuals, now and in the future, and allows needs to get met *without* requiring additional processes or bureaucracy.
        - Part of the human condition that your body can become disabled in a moment – no one is guaranteed a perfectly functioning body from one day to the next. Designing for maximum functionality allows the things you are creating to continue to work, even if personal situations change.

Definitions for Understanding Digital Accessibility

- RCW 43.105.020 defines Information as:
    - "(8) "Information" includes, but is not limited to, data, text, voice, and video."
        - Data is defined by State of Washington as "A subset of Information. A representation of information, knowledge, facts, concepts, computer software, or computer programs or instructions. Data may be in any form, in storage media, or as stored in the memory of the computer or in transit or presented on a display device."
            - Data in Transit is defined as "Data that travels through an email, web, collaborative work applications such as Microsoft Teams or any other type of private or public communication channel."
    - Nearly everything done as part of State of Washington business, or in other words, work done by state employees, contractors, vendors, volunteers, or interns, counts as information – and much of it is also counted as data.
- RCW 43.105.020 defines (10) "Information technology" as:
    - (10) "Information technology" includes, but is not limited to, all electronic technology systems and services, automated information handling, system design and analysis, conversion of data, computer programming, information storage and retrieval, telecommunications, requisite system controls, simulation, electronic commerce, radio technologies, *and all related interactions between people and machines*."
        - That last phrase, "and all related interactions between people and machines" is important for understanding that anything you do using electronics counts as IT.
- Digital Content is information that
    - Exists in electronic form (information that exists digitally) and
    - Is accessed, used, or stored on electronic devices.

Table of Contents

    - If you can interact with the information digitally, it is digital content.
        - For digital accessibility, this means that the policies, standards, laws, and other legal requirements for data, information, and accessibility / digital accessibility all apply! Policies | WaTech provides quick access to many of these policies and standards, often with links to most of the laws and other legal requirements that apply for state government.
- RCW 43.105 establishes Washington Technology Solutions (WaTech) as the agency responsible to "establish clear policies and standards for efficient and acceptable use of technology in state government, providing guidance and leadership to state agencies in deploying technology to meet their business objectives."
    - That purpose is further defined with the following:
      "Information technology is a tool used by state agencies to improve their ability to deliver public services efficiently and effectively … To fully realize the service improvements and cost efficiency from the effective application of information technology to its business processes, state government must establish decision-making structures that connect business processes and information technology in an operating model … To maximize the potential for information technology to contribute to government business process reengineering, the state must establish clear central authority to plan, set enterprise policies and standards, and provide project oversight and management analysis of the various aspects of a business process."
- State of Washington Digital Accessibility Policy and Standard applies to all "Covered Technology"
    - Covered Technology has the following definition:
        - All public-facing digital content and tools, including:
            - Websites,
            - Applications,
            - Documents and media,
            - Blog posts, and
            - Social media content.
        - Certain non-public-facing content that must also comply including:
            - All electronic content used for official business to communicate,
            - Emergency notifications,
            - Internal data collection structures,
            - Initial or final decisions adjudicating administrative claims or proceedings,
            - Internal or external program or policy announcements,
            - Notices of benefits, program eligibility, employment opportunities, or
            - Personnel actions, formal acknowledgements or receipts.
    - Nearly all *digital content* and *IT tools* used by state staff in their work are part of covered technology and expected to comply with the digital accessibility requirements.
- WCAG stands for the Web Content Accessibility Guidelines. State and local governments, and the vendors and contractors providing goods or services for government business, are *required* to

Table of Contents

follow these guidelines as formal digital accessibility standards (meaning these are not "guidelines," but requirements).

- Each *version* of WCAG covers all of the standards for lower-numbered versions. This means that the State of Washington requirement to meet WCAG version 2.2 *also* meets the standards for WCAG versions 2.1 and 2.0.
- The WCAG *levels* operate in a similar fashion as the versions. Level AAA *also* meets Level AA and Level A.
    - Organizations are generally recommended to build to the Level AA, as the Level AAA does not apply for all types of digital content.
- Washington State Digital Accessibility Policy and Standard holds state agencies and state organizations to the WCAG 2.1 Level AA through June 30, 2026. *Effective July 1, 2026, the level for compliance shifts to WCAG 2.2 Level AA*.
    - The trainings and resource materials that are the comprehensive set of basic foundational knowledge and skills for the Digital Accessibility in Government / EO 24-05 series are all geared for the WCAG 2.2 Level AA standards.
- WCAG is based on 4 key principles, using the acronym POUR: Perceivable, Operable, Understandable, and Robust.
    - There are multiple guidelines for each principle, and various Success Criteria for meeting each guideline.

Perceivable (First principle of WCAG)

- Text alternatives (alt text) for non-text content:
    - Definition.
    - How to write alt text that meets:
        - Plain Language guidelines and
        - Digital Accessibility for Plain Language (WCAG 2.2 AAA standard) and
        - Web Content Accessibility standards for Alt Text (WCAG 2.2 AA).
    - Avoid images of text and provide proper alt text when images of text are unavoidable.
    - Avoid floating text boxes for "design," unless they are placed "in line with text": Even when alt text is added to floating text boxes, they remain inaccessible / screen readers cannot navigate into the text boxes, so content inside of those are "invisible" to screen readers (e.g., text boxes uses for "pretty" formatting, such as for flyers / announcements).
        - Tip: Alternative is to insert a picture, use formatting to wrap text around the picture, and add alt text so screen reader can "read" the picture, communicate its content, and continue on with the text (i.e., right click on the picture, choose Format Picture, set how the text wraps around the picture, and add alt text to the image).
- All non-text content that are controls or accept user input is named in a way that describes its purpose to the user.
    - Non-text content is information on a screen that is not written.
    - Content that acts as a control or accepts input are things on a screen that expect the person interacting with the content (or the "end-user," "reader," or "audience" of that

Table of Contents

content) to do something. This can be controls such as buttons or links, or input fields like a checkbox or form area that the user is expected to fill.
    - Identification of the purpose of the control *and* the input purpose is included in the content:
        - The control needs to give information about what it is or what is expected from the audience. This can be something like using clear language of where a link will take the user or it can be more complex like the name on a form field that the user is supposed to enter their information into.
        - The control needs to include the purpose for the input *in an area* of the content *that does not disappear* once the audience starts to enter their information.
            - For instance, a form field that says "Phone number" to describe its purpose to the user. Details next to that purpose should give the user an idea of the format needed for the phone number. Those details on the phone number format need to not use the same field that the user will enter their information, as the format information would disappear once the user started entering their phone number.
- Captions and other alternatives are provided for multimedia (e.g., transcripts, ASL interpretation, etc.).
    - Address difference between open captions and closed captions and why WCAG requires open captions in most cases
    - How to write captions that meet:
        - Plain Language guidelines and
        - Digital Accessibility for Plain Language (WCAG 2.2 AAA standard) and
        - Web Content Accessibility standards for Alt Text (WCAG 2.2 AA).
    - How to write transcripts that meet:
        - Plain Language guidelines and
        - Digital Accessibility for Plain Language (WCAG 2.2 AAA standard) and
        - Web Content Accessibility standards for Alt Text (WCAG 2.2 AA).
    - Guidance on when sign language interpretation is recommended.
        - Include information on how to know which sign language should get used for multimedia.
    - General WCAG guidance for multimedia.
- Content presented in different ways, including presented in different ways by Assistive Technology (AT), without a loss of the content's meaning: Real digital text (not just an image of text) can generally be converted into all of the other useful sensory formats.
    - When new content is injected into a page (pop-ups), such as an "error message" or "confirmation message," blind users need to hear this new information. This is often neglected for screen reader-users and can result in "traps" for screen readers: Where the user doesn't know a popup exists and needs to close that popup (usually by using a computer mouse) in order to move forward with the content. Does not work for keyboard users.

Table of Contents

        - Users can't access content unless they know it's there. Make content and functionality available through sight, sound *and* touch.
    - Assistive Technology can present content in a different way than individuals without disabilities view it. For instance, screen magnifiers can zoom into content several hundred times the standard size. If the content is created with real digital text (not just an image of text), this will often work without losing function of the meaning of that content. However, images, graphics, and other content not built using real digital text can result in the content displaying over or under other content, or loss of meaning (e.g., due to pixelation / fuzziness the more that someone zooms in on that content).
        - Common example is using a snip (snippet) of the thing a creator wants to display, such as taking a snip of an agenda to place into a PowerPoint, taking a snip of a graphic or design to use as a background, taking a snip of a Teams chat, etc.
- Information is always easier for users to understand content if it is presented in different ways, using different sensory formats.
    - For digital accessibility specifically, this can mean being presented in written form, visual demonstration, audio / sound (such as reading content aloud / recording of the content being verbally shared), sign language interpretation / video, programming for digital accessibility to work with tactile / touch: such as proper formatting for refreshable Braille keyboards to work, etc.
- Information is distinguishable.
    - Use of color is not the only way of sharing the information. For instance, a color-coded pie chart needs written text of what each area represents, and use different textures that do not rely on color alone to indicate the section of the chart that they represent. (Examples provided as part of this training.)
    - Audio that plays automatically for uses for more than 3 seconds requires some way for the user to pause or stop the audio or there is some way to adjust the audio volume that is independent or separate from the overall system volume level.
    - Color contrast:
        - Text and images of text require a contrast ratio of at least 4.5 to 1 unless they are at least 18 pt font or 14 pt bolded font (also called large text)
        - Large text and images of large text (18 pt font or 14 pt *bolded* font) use a contrast ratio of at least 3:1
        - Instructions for using WebAIM to test color contrast, as the site strongly recommended for government testing of color contrast
            - Instructions for which pixel areas to test for contrast ratios
        - Exceptions to color contrast, like when the text is part of a logo or brand name.
    - Color selections and brightness – when text color is too similar to the background color or design
        - Need to adjust brightness or color selections to give enough contrast

Table of Contents

        - Keep in mind that many with disabilities of how their brains developed or function (such as brain injuries) are sensitive and have uncontrollable physical reactions to bright colors. Muted colors is best practices for inclusion and accessibility.
    - Spacing of text:
        - Line height or line spacing is at least 1.5 times the font size
            - Instructions for checking and adjusting this.
        - Spacing after paragraphs is at least 2 times the font size
            - Instructions for checking and adjusting this.
        - Letter spacing or the space between each letter is at least 0.12 times the font size
            - Instructions for checking and adjusting this.
        - Word spacing or the space between each word is at least 0.16 times the font size
            - Instructions for checking and adjusting this.

Operable (Second principle of WCAG)

- Navigating all components In, Within, Through, and Out – navigate into all components, use the features within them, navigate through them, and navigate out of all of them regardless of the device you're using to access it.
    - Keyboard functionality (not just mouse): The user can access and review the information using a keyboard and there are no parts of the content where the user must use a mouse to access information, enter or interact with the content, and move away from the content.
        - All functions of the content can be navigated through using a keyboard (no mouse) and typically does not require specific time limits for entering information
    - Give users enough time to read and use content: cannot time out of something without notice to the user and ability to extend the session – timing provided is necessary to meet accessibility needs (and general needs in our busy work environments with constant competing priorities)
        - Details around the ways this requirement can be met.
    - Don't use content causing seizures or physical reactions (blinking, flashing, etc.)
    - Help users navigate and find content
        - This includes making sure that if you use a control (button, link, checkbox, form field, etc.), you make the area that the user needs to select for using the control big enough that a user with disabilities can easily select it. The target size is at least 24 by 24 CSS pixels for most situations.
            - Information about how to test CSS pixel size.
    - Make it easier to use inputs other than a keyboard
    - There are no popups or other content that changes the focus of the cursor that requires use of a mouse or something other than a keyboard. "Keyboard traps" are areas where the cursor (or focus) is moved to a component of the content (like an image or a popup), and the user can only move away from that component by using something other than a keyboard, like a mouse.
- Digital Information is designed to be easily navigated.

Table of Contents

- There is a way to bypass blocks of information or content that are repeated.
    - An example of how this can be done in a document was included in the General Information at the start of this document: "For sighted users not using the navigation pane, a link to the document's Table of Contents is provided within the footer of each page. It is placed in the footer to avoid screen reader-users having to hear the link repeated multiple times. The link allows users to quickly move between different sections, for ease of reference and review of specific topic areas."
- "Document Properties" can give content an initial framework that has coding which works for assistive technology (e.g., using the document property selection for Title to set your document title, Author, to set the authoring agency information, publish date, etc.).
- Focus Order: The information can be navigated in a logical reading order that makes sense, preserves the meaning of the content, and in a way that makes the information easy for a user to operate.
    - Reading order does not mean the same thing as focus order.
        - Guidance around the differences and why focus order is critical and reading order checks are not sufficient to meet requirements.
- Link Purpose is given in context: The purpose of each link is understood from the link text alone with few exceptions. This is because individuals who use screen readers and other assistive technology are provided the list of links that is in that digital content without the links being "read" in the sentence or paragraph where they are in the document. If the link only says "click here" or "link" it does not tell the user where they can expect it will take them. Links that provide this information are considered links given in context.
    - Link Purpose Example: The Disability Inclusion Network website is where staff can find the digital accessibility trainings and resources for this project.
    - No Link Purpose Example: Click here to learn more.
- Headings and Labels describe the topic or purpose:
    - Semantic Headings and Labels: Headings and Labels that have programming built in so that they work for keyboard navigation and assistive technology.
        - Use heading "styles" for headings, rather than bold or larger font. This allows the headings to be "read" by screen readers and work with keyboard navigation of your information.
            - Make sure headings follow their numbered order. Your document should not jump between a Heading 1 to a Heading 3 then on to a Heading 6 and back to a Heading 2.
            - Do not use headings more than a Heading 6. Those are not picked up by all assistive technology.
        - Labels are used for telling users what the text or text alternative is presenting, such as the label for a table. They use *programming* that connects their relationship to the text or to other information that uses a text alternative (alt text) to label that item. Labels are presented to all users, and are not part of the hidden information that is only exposed by assistive technology.

Table of Contents

        - When creating headings and labels, make sure to describe the topic or purpose. This is because individuals who use document navigation, screen readers, and other assistive technology are provided the list of headings and labels that are in the digital content without any added information for understanding. Headings and labels that use, "Table 1," "Section 3," etc. do not allow them to know what that information is about. This is also part of why those headings and labels need to use the programming versions (e.g., Heading Styles) instead of only bolded or large text.
            - Bolded or large text and text that uses italics are all visual styles that *do not provide programming to relay the information*. This means that those who are hearing the information read to them do not know which words or phrases are bolded, larger text, or italicized. Using those visual styles holds no meaning for the information those users receive. That is why you must use the programming that provides them the critical information you are trying to share.
    - Focus not Obscured: This means when someone who uses a keyboard is moving through your digital content, the item that they select or navigate to in your content needs to not be hidden because of other digital content you have there. This sometimes happens when adding images, graphics, tables, SmartArt, and other similar items to your content. If you do not make sure to wrap text around that content, you run the risk that your added item will cover some of your other content.

Understandable (Third principle of WCAG)

- Make text readable
    - Headers, tables, table headers, etc.
        - Information on limits to no more than 6 header levels to have headers work for assistive technology
        - Information of using header styles versus inaccessibility of only bolded text
        - Proper formatting for table header styles and when to use for columns, rows, or both
- Make text understandable (under grade 9 reading level, language of parts, language of whole)
    - Language of Whole (or Language of Page): Programming in the content what the language is that the content is written in.
    - Language of Parts: When most of the content is written in one language, and another language(s) are used for some of the content, add programming that marks that area of the other-language content as being in that additional language.
        - Instructions for programming language of parts regardless of the digital tool being used.
- Headers and other semantic structures (bullets / numbered lists): Define what these are and explain how to use correct structure
- User-test your material is plain language with someone who is unfamiliar with the topic or idea of the message that is needing to be shared

Table of Contents

- Use supplemental formats, especially when conveying complex or long messages : Alt text for images, audio, video, multimedia, transcripts, sign language, closed captions, etc.
- NOTE: AI auto-translation or AI plain-language options often *do not meet the standards* required
- Consistency and predictability – consistent look and feel, aligned across the document and between similar documents or formats, use of same icons / brand details representing same thing across content / documents, consistent use of terminology / definitions (also applies across websites and their web pages – use consistent navigation and feedback mechanisms (e.g., don't have the menu at the top left on the home page then in the middle or far right on subsequent pages)
- Help users avoid and correct mistakes (e.g., for input fields instructions): Instructions, hints, "tooltips," contextual help
    - Required fields all clearly indicate they are required, using more than just a visual cue (such as only using a red asterisk "*").
    - Mark if a button is read-only or disabled, using the correct programming.
        - Guidance of proper way to do this no matter what digital tool is being used.
    - Mark if data must be in a certain format and what that format is. Make sure this information is not in an area that the user cannot access once they start entering their information.
    - Tell the user if a password requires a minimum number of characters and/or must use a combination of numbers, letters, and/or symbols (special characters)
    - Tell the user if there is a limit to the total number of characters they can enter
- Any constraints, instructions, hints, tooltips, and contextual help should be visibly noted next to the field and not disappear as characters get entered. It also must be "readable" by screen reader users.
- Additional expectation that if the information being provided by the user involves services, finances, or similar legal and important impacts if it is not complete or incorrect:
    - Users should receive a confirmation message that is required before they submit their information.
    - Never use auto-submission once a user navigates away from the final required field, because of the risk created when it involves services, finances, or similar legal and important impacts (including most applications or required submissions to access certain government services)
    - Make sure to have error messages that explain to the user what information is missing or needed for required fields.
- Make sure to have confirmation and error messages "readable" for screen reader users without them needing to hunt for the message or bypass a long passage of navigation or text to know
- Make sure you do not require users to follow a cognitive function ability test like remembering a password or solving a puzzle for any step in a user authentication process, unless you provide at least one of the following:
    - Another authentication method that does not rely on a cognitive function ability test
    - A different way for the test to get completed that assists the user
    - The test is to recognize objects

Table of Contents

- The test is to identify non-text content that the user provided to the website (like a picture, emoji, keyboard characters, etc.)

Plain Language for Digital Accessibility

Resource: WA State Plain Language for Digital Accessibility (on dinbrg.org)

- Governor Executive Order 23-02 information and requirements
- State Plain Language Guidelines
- Agency Guidelines to meet Plain Language
- 2024 Digital Accessibility specific requirements for Plain Language under the Web Content Accessibility Guidelines (WCAG)
  - State of Washington must apply WCAG 2.2 Level AAA to meet State Guidelines for Plain Language requirement, federal references requiring state and local government to use plain language according to WCAG and the WA State Digital Accessibility Policy and Digital Accessibility Standards
- Digital content is the *information* accessed, used, or stored digitally. It includes things like:
  - Conventional electronic documents: defined by the Americans with Disabilities Act as content that is in the following electronic file formats only: Portable Document Formats ("PDFs"), word processor file formats (such as MS Word or Notebook), presentation file formats (such as MS PowerPoint), and spreadsheet file formats (such as MS Excel).
  - Web content: content on web pages and web sites. The information that the web page or website is conveying, and not the back-end programming or coding for that web location.
  - Content in mobile applications (apps): content that is typically accessed through a software application that is downloaded and designed to run on mobile devices, such as smartphones and tablets.
  - Content on "closed systems" or "closed functionality": content existing on internal-only electronic systems, tools, or platforms, including intra-net, SharePoint Online, ACES, Barcode, kiosks, etc.
    - These are often technologies that users cannot attach an external assistive technology to that system, in order to make the content accessible.
  - Content stored in the Cloud: content that is not stored on a hard drive, other types of local electronic systems, or on a primary server location at a business facility (also called OnPrem or On Premises).

Robust (Fourth principle of WCAG)

- Maximize compatibility with current and future user tools (e.g., mobile devices, tablets, iPads, etc.): follow standards and use valid, well-formed markup / structured organization in digital content
  - Usability regardless of browser, system version (e.g., iPhone 10 or above, MS Edge v.1.3, Google Chrome v. Firefox v. MS Edge, etc.)

Table of Contents

- User Interface Component = part of the content that's perceived by users as a single control for a distinct function / user controls (e.g., form elements including the fields where users input their information, links, buttons, etc.)
- All User Interface Components follow: Name, Role, and Value in building the structure of digital content. This means if the user is supposed to interact with something in the digital content directly (click a link, enter information into a field, select a checkbox, etc.) then there needs to be coding for that field that includes the program language for Name, Role, and Value.
    - If you are not a developer and do not know programming language, then you need to work with an IT or web person who can help you develop formatting for your input fields correctly.
        - The tools that are built into PDFs, Word, etc. for form field entries, check boxes based on a shape or drawn, etc. do NOT provide the necessary "macros" / programming language to meet digital accessibility requirements and should be sunset in any documents actively getting used as part of business operations. If you are unsure if yours were created correctly, check with your agency's IT or web experts to check the macros / metadata to verify Name, Role, and Value are coded correctly.

Digital Accessibility Universal Design Basics (Tool-agnostic requirements)

- Seven principles to universal design to guide your accessibility efforts:
    1. Equitable Use: Should be useful and easy-access for using (marketable) to all regardless of abilities – if possible, everyone should be able to use the environment or product in the same manner. If identical use isn't provided, then must have an equivalent option available in the same timeframe as the primary thing (ADA Title II requirements, also applies to a degree with ADA Title I).
    2. Flexibility in Use: Design of the thing (environment or product) should provide people with a variety of options for use of its features – should be adaptable to an individual's preferences and abilities
    3. Simple & Intuitive Use: Purpose of the product / environment's features should be easy to understand, where a person's background, language or experience shouldn't hinder their understanding of how to use the product or navigate the environment
    4. Perceptible Information: Info about the product or environment's design should be communicated effectively and perceivable to everyone – a person's sensory abilities shouldn't hinder them from receiving information / information should be presented in different formats to increase effective communication with individuals with diverse abilities
    5. Tolerance for Error: Design of the product or environment should reduce chances of accidents or hazards from occurring – design should anticipate any unintentional

Table of Contents

actions that may occur during use (part of why we do usability and user experience testing)

6. Low Physical Effort: Design of the product/environment should require little to no physical effort to use – a person should be able to use the product or navigate the environment comfortably without feeling fatigued during use or after use
7. Size & Space for Approach & Use: Sufficient space should be provided in the design so it allows anyone to use the design features regardless of physical build or physical abilities (e.g., buttons / selections too small for large fingers on a mobile device / touch screen) – mobile devices provide range of options for accessibility such as screen reader with modified gestures, zoom, tabbing, changing high-contrast settings, modifying audio output and captions, etc. (UD Principle 2 and Principle 4)

- Captions, Transcripts, and Audio Descriptions: Not everyone can see video or hear audio and some process information better with multiple input methods (e.g., audio plus visual)
    - Information should be equal or equivalent to those who are sighted and hearing: If details are available to those who can see and hear, need to have the same details communicated to those who cannot
- Link Destinations – based only on the language for the link (link text), do you know where it's taking you or what to expect (e.g., click here, select, etc. not helpful)?
    - It is not just for screen readers, but good link text makes navigation more understandable for everyone including people with cognitive disabilities, learning disabilities, brain injuries, etc.
- Headings and semantic structure to organize content and improve navigation – for screen reader users, cognitive disabilities, or those who are extremely busy and need to get info fast and streamlined
    - Screen readers have keyboard shortcuts that allow users to jump from heading to heading, skipping over all of the text between headings – only works if use real headings (Heading 1, 2, 3, etc.) and if headings organized well (not H1, then H3, then H2, then H4) – Headings, like links, should be informative for the info contained within that section
- Don't assume everyone uses a mouse – keyboard functionality, tab order, visual focus indicators
- Tables: Use ONLY for data and not for template / formatting
    - Associate data cells with header cells: Without an explicit association between a header cell and data cells, screen readers just read the content of the data cell without giving any context or letting users know what the cell represents – when formatted correctly, screen readers read the header cells before each data cell when navigating through the data cells
        - Headers can be used for both columns and rows: e.g., number of candies in children's bags by day of week – reads child's name then day of the week then data within the related data cell (e.g., Jeremiah, Sunday, 84, Monday, 78, Tuesday 56, Wednesday 42, Thursday, 23, Friday 15, Saturday, 0; Anne, Sunday, 125, Monday, 124, etc.)
            - Not marked properly, screen reader will say, Jeremiah, 84, 78, 56, 42, 23, 15, 0. As you go through the days of the week, you may lose track of which day

you're on – was 42 for Wednesday or was it for Thursday? It's easy to forget and with larger and more complex tables, this becomes an even bigger problem.

    - No merged or split cells – "breaks" functionality for understanding the table for screen readers
- Forms: Form controls need labels: every form element needs a label and that label must be associated explicitly with the form element in the markup.
    - When users see a text input, they need to know if they should type in their name, their phone number, or their email, or what kind of cereal they ate today for breakfast – that's where labels are needed for the form. Sighted users see text on the screen so all you'd need to do for them is type the label next to the form control, such as "Name" or "Email"
        - Not everyone's sighted so that's where you need to make sure the screen reader reads the label *with* the form element – use a formal "<label>" tag so when screen reader focus is on that form element, it reads "Email, text input, blank" (blank meaning there's no text in the text input yet).
- ANDI is an online "favelet" or "bookmarklet" hosted by the federal government for free testing of intranet and web – including SharePoint Online (favelet / bookmarklet providing automated detection of accessibility issues)
    - Provide tutorial training on how to navigate, use and "read" the ANDI information to do fixes
    - Basic understanding of ARIA for state staff (Accessible Rich Internet Applications): A markup language that can be inserted in HTML to announce things like when a tab is selected or checkbox is checked or a tree view and its branches are expanded
        - ARIA makes interactive JavaScript accessible to people who can't see and allows web pages to "talk" to screen readers in ways that weren't possible before
        - Necessary to maintain keyboard focus for all actions with programming and interacting with web, Cloud, apps, widgets, etc.
        - Makes interactive widgets more accessible to digital ATs without changing the visual appearance – all of the markup happens in the code
- General information on PDFs and how to make accessible or provide an accessible alternative:
    - PDF documents only accessible if done in a "tagged PDF" format, edited for reading order, tab order, and other semantic and structural markup *or* have an accessible alternative to the PDF document readily available
    - Tagged PDFs marked up similar to HTML files – mark text for headings, paragraphs, lists, tables (including row and column headers), and other semantic elements, including marking images and giving them alt text
    - Start with good accessible document in an authoring tool *before* creating a tagged PDF file (e.g., MS Word, Adobe InDesign) – those can convert to tagged PDF pretty well.
    - Only way to create tagged PDF file *requires* Acrobat Pro or higher – free Adobe Reader can *read* tagged PDF files but *can't create them* or run PDF-automated accessibility checks on them – many software tools can create plain PDFs but not tagged PDF files so those

Table of Contents

untagged files are inaccessible to screen readers – Acrobat Pro or higher helps with the conversion to tagged PDF though still requires manual touchup of the file after conversion

- Lists
    - Unordered list (bullets, order doesn't matter to the context)
    - Ordered (Numbered or alphabetized, sequence of the list matters to the context (e.g., steps for doing something))
- Language – default language, language of parts
- Cascading Style Sheets (CSS) basics for keyboard accessibility by *content developers* (anyone writing content in a digital format: document, slide deck, form, web page / website, intranet, etc.) (Cascading Style Sheets = using proper semantic markup to organize digital content)
    - Describes how elements should be organized on a screen, on paper, in speech, or on other media and allows them to display properly for screen readers when content moved into web or mobile applications
- Reading order is not always the same order as the document is written / developed, so needs to get *verified manually* to ensure the order read for a screen reader / keyboard user matches the logical reading order for the content – just because content visually displays for a sighted user in a way that logically tracks for the language used (e.g., content in English tracks from top to bottom and left to right), does not mean that the reading order follows that same pattern – and automated checkers cannot always determine if something logically tracks for that language
- Captions – closed captions means those captions don't appear in the video for people who don't turn them on. If you do closed (rather than open) captions, need to make sure the command to turn those on is something perceivable for keyboard-users and doesn't rely on audio instructions (e.g., presenter announcing it verbally at the beginning of a meeting as the only way it's known)
- Audio descriptions – closed audio descriptions only heard if turned on, and instructions to turn them on need to be provided in multiple formats (difference of audio descriptions from dubbing or voice-over)
- Accessibility Fixes that alter visual appearance:
    - Color contrast
    - Links to skip navigation (good practice to put a link at the top of a web / intranet page that allows users to skip past the navigation and go directly to the main content of that page – most helpful for sighted keyboard users, though may also benefit blind screen readers. Many designers make the link "invisible" until users tab to it with their keyboard, then make it disappear again once users tab away from it – this allows sighted users to use it (as well as blind / low-vision users) without cluttering the visual design with an extra link
    - Designing for cognitive disabilities in mind:
        - Simplify the content down to barest minimum
        - Depending on the cognitive disability, may need to provide images / videos / audio / interactive components rather than text – not always the target audience, however
        - Can illustrate concepts with images, avoiding use of slang or idiomatic expressions, expanding acronyms and abbreviations the first time they appear in the section

Table of Contents

- Designing with accessibility in mind from the beginning is easier and cheaper than retrofitting: takes a little bit of extra forethought and planning, yet saves you a lot of work down the road!
- Usability vs. User Experience and User-Centered Design
    - Usability is only one part of user experience, not the whole
    - Usability: easy to use, allows users to become proficient, users able to easily achieve their goals through the design, and easy to learn.
    - User Experience:
        - Usability (access, easy use, and complete / exit)
        - Useful content: provides enough easily understandable info so users can make informed decisions
        - Desirable / Pleasurable (Personally Meaningful) content: User forms an emotional bond with the content
        - Accessibility: meets accessibility standards so it's accessible to users with disabilities
        - Credibility: trust that a user feels for the content (including security and privacy) – plays a role in the overall user experience when users can trust what they're accessing
    - User-centered design: User is at the center of every part of the design and development process. When creating more substantial content (e.g., access to government services) this means:
        - Involving users throughout the entire process – user research (surveys, feedback, input) and user testing
        - Taking iterative approach and conducting testing after each stage of development to ensure things are working well in reality / meeting the underlying needs of end-users and business / agency needs
        - Conducting user testing for accessibility in the iterative cycles (easy to "break" accessibility when add new features or adjust designs)
- Myth-busting:
    - Accessibility only benefits a small minority
    - Accessibility is a short-term project
    - Accessibility should be the last step
    - Accessibility is hard and expensive
    - Accessibility is ugly – makes designs ugly
- Work towards the Digital Accessibility-related laws: Federal, Washington State, State Policies / Standards

MS Document Accessibility General Principles

Keep in mind that the foundational Web Accessibility Content Guidelines (WCAG) information are covered in the first level foundational materials. The tool-specific materials focus on how to perform that action in that tool: to create it for accessibility and to test for accessibility.

Table of Contents

- Best practices
- Checking accessibility while you work
- Headings styles
- Paragraph banners
- Add Alt Text for visuals and complex tables with a lot of information
- Color to convey meaning (use a second indicator always)
- Color contrast
- Font, Layout, and Formatting:
    - Readable fonts (Tahoma, Verdana, Garamond, Cambria, Arial, Aptos, etc.) – test: check the distinction between the capital I and lowercase l – if not easily distinguishable from one another, use a different font – avoid overly decorative fonts that are often hard to read (sans serif fonts are the ones that can distinguish between the capital "I" and lowercase "l")
    - No official minimum font size but 12 point is standard choice for text documents, and 24 point for presentation documents
    - Visual styling like bold, italic, underline, and highlighting used sparingly for visual emphasis – can be helpful to many users (with and without disabilities) – be aware screen readers don't announce these stylings, so don't rely on them to convey critical meaning (such as headers, rather than use a style header). If you're using it for conveying critical meaning, must supplement with text (e.g., the word "important" next to each applicable item) – text is the golden standard, so always rely on it to convey meaning
        - Reserve underlining for just hyperlinks
        - Watermarks, page headers and footers are not picked up by screen readers – do not use those to convey important information
            - Watermarks often cause difficulties for sighted users with cognitive or low-vision and colorblindness disabilities – avoid where possible and never use over important or critical text
        - Left-justify text: avoid "full justification" which aligns the text with both the left and right margins because this causes large, white spaces between letters and words that make the text difficult to read
        - Keep paragraphs brief if possible and ensure there's enough white space between the lines and paragraphs so text isn't scrunched up together and difficult to read (e.g., double-spacing between lines)
        - Symbols should be used sparingly – often problematic for screen readers, incorrectly announced or not announced at all – best to avoid altogether unless the document has very common ones (the "at" symbol @ ; dollar sign $; hash or pound symbol # (tic-tac-toe board)) – best to provide text alternatives instead. Test the symbols in your document with a screen reader – though note that a symbol can be read correctly with one type of screen reader and not by another
        - Emojis are a type of symbol but are usually small images that nowadays have built-in alt text – so are generally ok to use

Table of Contents

- Typographical symbols, however, are characters and these are frequently the ones causing trouble for screen readers
- Math equations in documents are tricky since they're comprised of symbols. There's no single way to make math equations in documents accessible – in some cases built-in math within a document program is accessible and other times, not
    - When built-in math isn't accessible, a common solution is to use MathType (a paid program that creates accessible math understood by screen readers and correctly conveyed to users – check with your agency if this is needed for your work)
- Links: Must be semantically designated as links – meaning created in a way digital assistive technologies can recognize (rather than formatted with just the visual aspects like font color, underlining, and other styling) – semantics add structural meaning to elements so that tools like screen readers can recognize them and convey they appropriate info to users
    - Many MS programs have it auto-programmed so when you type in a URL and hit space or enter, the link automatically becomes a semantically-designated link. But if you just copy/paste the URL and don't hit space or enter – it remains a black, non-clickable text that is not semantically designated. If a screen reader user were to pull up a list of all links in that document, that one wouldn't show up because it's not semantically designated
    - You'll also want to ensure you can easily tell the link apart from the surrounding text and that it meets color contrast requirements for the font color and background color. Not all default semantic links' colors meet the color contrast requirements and/or are easily distinguishable from the surrounding text (this is also another reason to reserve using underlines for links, to help visually distinguish it as a link versus the surrounding text)
        - Screen readers will read every character in a URL if you don't provide easily readable word or phrase with the link embedded. Don't include the words "link to" in the meaningful link text, as this is already automatically announced by screen readers and would be redundant (i.e., screen reader reading a link text of "link to menu" as "link to link to menu")
    - Tables: only use for tabular data and not formatting or template use
        - Create real, semantic tables (semantic means created in a way that provides structural meaning so that digital ATs like screen readers can recognize them) – in document programs, this usually means using the "Insert Table" option rather than "drawing" a table or inserting a table as an image / snip
        - Provide a table name – can be done using a heading directly above the table. Some programs also allow alt text for the table, which you

Table of Contents

should do – but that's only helpful to screen reader users so also include a visible title, as well.
        - Titles should be meaningful, accurately describe the purpose of the table, and unique within the document for users to tell the tables apart from one another.
            - Best practice is to also provide a table summary – a simple overview of what the table is about – in plain text above or below the table.
    - Include real headers in the table – semantic tables, not just big, bold text (e.g., marking options of Header Row and/or First Column in the Table Design tab – usually checked by default, make sure those are maintained) and make sure headers are also meaningful to describe what that data in that row or column is (e.g., Column 1 or Row 1 don't give any real info, but birth date and social security number do)
    - Create only simple tables – if possible, tables should have only 1 header row and 1 header column at most. More complicated data relationships like split or multi-level headers aren't supported by most document formats and even when support – often can be very confusing to navigate with screen readers and results in glitches, even if you created them "perfect" according to accessibility specs – instead, break a complex table into several, simpler tables instead. Also easier for sighted readers to understand and digest the information easily.
    - Mark up blank data cells so that a screen reader hears something other than silence when they get to that cell – like N/A or "intentionally blank."
    - Don't merge table cells or insert a table within a table – also called a nested table, as both of these cause issues with screen reader navigation.
- Headers and footers, slide notes, floating objects such as text boxes and comments are all also not automatically announced by screen readers in all programs – meaning a user must deliberately enter and read them but that requires the user to know they exist. Avoid placing critical info in them or duplicate it in the body of the document. For instance, having the word "confidential" for a sensitive document placed only in the header is not a good idea.
    - Confidential materials should also be marked with the appropriate sensitivity setting for the document, where appropriate. For instance, if the material is protected health information with special handling requirements, the document should have the sensitivity setting (found in the navigation ribbon for that tool – often at the top of the document screen) set to the Category 4 – Confidential Information Requiring Special Handling setting.

Table of Contents

        - Slide notes are accessible, but a user needs to be made aware if there's important information in them – they're not read automatically by screen readers, so a user would need to deliberately enter them to read the contents.
        - Floating objects, such as text boxes (often used for layout design for making something more visually appealing) are problematic for screen readers in many instances.
        - Comments are accessible – though in some cases you'll need to alert users that they're present so the user would need to deliberately enter them to read.
    - Exporting from one file format to another: Sometimes all or most of the accessibility work is done within the original or starting file – other times you'll need to take additional steps after you export in order to make it accessible (this is always the case with PDFs, though how much needs to get fixed for accessibility after exporting does depend on your method used for exporting).
    - Keyboard users can hold Shift and press F10 to perform the same action as right-clicking on a mouse, when an object or element is selected. This opens the document's context menu.
    - Initial accessibility checks:
        - Automated checker: Navigating to it and how to use the information it provides
        - Editor feature for testing document statistics like reading level
        - Using Immersive Reader for additional testing:
            - Keep in mind that Immersive Reader does not give the same experience as a screen reader and should not be considered the same

VPATs and ACRs

- Voluntary Product Accessibility Templates (VPATs) explain what parts of a product pass the Section 508 accessibility guidelines and what parts do not.
- The VPAT serves as a template guide for testing a product's accessibility.
- VPATs act only as a *template* for testing.
- Accessibility Compliance Reports (ACRs) are the output of using a VPAT and running testing of a product. VPATs and ACRs are not third-party quality controlled or verified of their VPAT / ACR claims, so VPATs / ACRs from a contractor or external product are limited in their reliability – they should never be taken as sufficient as proof by itself.
- ACRs and VPATs are specific to Section 508 Technical Standards.
    - This references Section 508 of the federal Department of Health and Human Services "Rehabilitation Act of 1973." That is a federal law prohibiting discrimination against people with disabilities by federal agencies, federal contractors, or "programs receiving federal funds" – this includes state agencies receiving federal funds.

Table of Contents

    - Section 508 is specific to "Electronic and Information Technology" requirements for accessibility
    - Section 508 digital accessibility requirements are at a *lower* level of accessibility standard than Washington State policy or the new standards for the federal Department of Justice – Americans with Disabilities Act requirements (WCAG 2.0 Level AA for Section 508 conformance; WCAG 2.1 Level AA for DOJ-ADA conformance; WCAG 2.1 Level AA for State Policy conformance until 7/1/2026 – then WCAG 2.2 Level AA for covered technology (internal and public-facing) for state conformance)
        - Section 508 conformance is not sufficient to meet the ADA obligations for public organizations like state agencies, nor is it sufficient to meet the state policy and standard.
- Documentation of accessibility validation for all "covered technology" used by the state is required under the state Digital Accessibility Standard (USER-01-01-S) to meet the state Digital Accessibility Policy (USER-01)
- State agencies may develop their own VPATs and resulting ACRs following the state and DOJ requirements, for confirming WCAG 2.2 Level AA conformance of all covered technology

State Deadlines for digital accessibility

- State Policy and Standard: Expectation is that covered technology already meets the WCAG 2.1 Level AA requirements, based on USER-01 being an update to the prior Office of the Chief Information Officer (OCIO) Policy 188 dating back to 3/10/2010
- With the federal rulings in early 2024 (DOJ-ADA, HHS Section 504 of Rehabilitation Act, HHS Section 1557 of Affordable Care Act) applies to all public-facing and most internal digital content and tools:
    - DOJ for public-facing for all WA state agencies / state organizations deadline is April 24, 2026 for conformance at the WCAG 2.1 Level AA standard
    - HHS rulings impacting nearly all internal-facing for WA state agencies / organizations that receive any federal funding from HHS deadline is May 11, 2026
    - Section 504 (and related Section 508) and Section 1557 also require those WA state agencies and organization receiving any federal funding from HHS to have a "Section 504 Coordinator," "Section 508 Program Manager," and "Section 1557 Coordinator" – Section 504 Coordinator required by 9/6/2024, Section 508 Program Manager required by 1/20/2024; Section 1557 Coordinator required by 11/2/2024
        - Note that the Section 504 and Section 1557 Coordinators hold responsibilities additional to and significantly larger in scope than only digital accessibility
- State Policy and Standard updated in 12/2024 for USER-01 and USER-01-01-S require:
    - "Effective July 1, 2026 the minimum level of compliance for accessibility is Level AA compliance with WCAG 2.2" = WCAG 2.2 Level AA by 7/1/2026 for all "covered technology" (internal-facing as well as external)

Table of Contents

MS Base Tools Digital Accessibility

Keep in mind that the foundational Web Accessibility Content Guidelines (WCAG) information are covered in the first level foundational materials. The tool-specific materials focus on how to perform that action in that tool: to create it for accessibility and to test for accessibility.

MS Word

- Alt Text: adding to images and objects (pictures, clip art, charts, shapes, SmartArt graphics, embedded objects, tables, etc.)
- Document Styles (heading and paragraph styles creating structure in the document that translates for screen readers, web / app programming (Cascading Style Sheets (CSS))), etc.)
- Headings: Short, descriptive titles of fewer than 20 words or one line long making it easy for readers (including screen readers) to navigate the document
- Colors used carefully: Checking default colors to ensure proper contrast, color schemes and texture variations in graphs to improve readability / not using only-color to convey information, designs tested (many default ones fail accessibility)
- Fonts and spacing: Locating the sans serif fonts / how to determine if a new default font meets accessibility, sufficient spacing between letters and between lines, recommended font sizes for body text, ensuring fonts are digital text (not pictures of text)
- Hyperlinks named appropriately / meaningful text reflecting the link destination or subject – reflecting the target landing spot and purpose of the link, default color of hyperlinks checked for color contrast, hyperlinks in header / footer work almost exclusively for sighted users
- Watermarks and other background images not used and why – never used to convey critical information
- Tables and Table markup: only simple (not complex) tables used and only for data, not for template / design format appeal, no merged or split cells, title, column / row headers, when to add alt text
    - Use of Dynamic Table of Contents in document – when appropriate and how to ensure easy navigation for all users (e.g., hyperlink in footer returning to TOC to not clutter screen readers repeating same info page over page)
- Headers and Footers not used for critical information as not read by screen readers, ok as alternative format for sighted users navigation as screen readers have
- Page properties and Document properties (built-in Title, Subtitle, Author, Date, etc. as document properties)
- Charts and Graphs – Complex or long images and charts provide long descriptions, can be a linked document (as long as the linked location is also accessible)
- Caution with use of blinking, flashing, and animated images
- Caution with using built-in Designs: Often not accessible
- White space: Ensuring good amount of white space on documents to reduce the reading load – bullets or numbered lists can help instead of long sentences of lists or steps, balance of longer documents with more white space versus prior approach for single-page packed load of

Table of Contents

information (if after made as concise as possible / only critical information remains, then better to use 3 pages with sufficient white space, headers, lists, etc. than force into a single page too crammed to process easily)

- Running accessibility checks and fixing issues:
  - Automatic
  - Manual
- Other training materials as determined by the topic area workgroup to be foundational to state staff understanding and operation of accessibility in MS Word

MS Excel

Keep in mind that the foundational Web Accessibility Content Guidelines (WCAG) information are covered in the first level foundational materials. The tool-specific materials focus on how to perform that action in that tool: to create it for accessibility and to test for accessibility.

- Best practices for making Excel spreadsheets accessible
- Check accessibility while you work in Excel
- Create accessible tables
  - Includes titles in the first row and first column of tables
- Use an accessible template
- Add text to cell A1
- Add alt text to visuals
- Unique Names (Rename Worksheets): Give all sheet tabs (worksheets in an Excel file) and the file (workbook in an Excel file)
- Add accessible hyperlink text and ScreenTips
- Use accessible font format and color
- Create accessible charts
- Delete blank worksheets
- Name cells and ranges
- Caution with use of blinking, flashing, and animated images
- Test the accessibility of your worksheets
- Table structures to avoid
- Name cells and ranges
- Running accessibility checks and fixing issues:
  - Automatic
  - Manual
- Other training materials as determined by the topic area workgroup to be foundational to state staff understanding and operation of accessibility in MS Excel

MS Outlook

Keep in mind that the foundational Web Accessibility Content Guidelines (WCAG) information are covered in the first level foundational materials. The tool-specific materials focus on how to perform that action in that tool: to create it for accessibility and to test for accessibility.

- Check accessibility while you work in Outlook

Table of Contents

- Avoid using tables
- Use built-in headings and styles
- Create paragraph banners
- Add alt text to visuals
- Add accessible hyperlink text and ScreenTips
- Use accessible font format and color
- Create accessible lists
- Adjust space between sentences and paragraphs
- Caution with use of blinking, flashing, and animated images
- Request accessible email
- Test accessibility with Immersive Reader
- Running accessibility checks and fixing issues:
    - Automatic
    - Manual
- Other training materials as determined by the topic area workgroup to be foundational to state staff understanding and operation of accessibility in MS Outlook

Basic Interactive Tools Digital Accessibility

PowerPoint

Keep in mind that the foundational Web Accessibility Content Guidelines (WCAG) information are covered in the first level foundational materials. The tool-specific materials focus on how to perform that action in that tool: to create it for accessibility and to test for accessibility.

- Best practices for making PowerPoint presentations accessible
- Check accessibility while you work
- Create accessible slides
- Unique Titles for each slide
- Avoid using tables
- Add alt text to visuals
- Create accessible hyperlink text and add ScreenTips
- Use accessible font format and color
- Use captions, subtitles, and alternative audio tracks in videos
- Realize notes may not be read by assistive technology
- Check spacing between sentences and paragraphs
- Avoid floating text boxes, SmartArt, and built-in Designs (generally not accessible to assistive technology) – use Content Placeholders instead for accessibility with assistive technology
- Captioning and audio descriptions for any audio or video components
- Avoid images of text like snippets of agendas
- Caution with use of blinking, flashing, and animated images

Table of Contents

- Save your presentation in a different format
- Test accessibility with a screen reader
- Running accessibility checks and fixing issues:
    - Automatic
    - Manual
- Other training materials as determined by the topic area workgroup to be foundational to state staff understanding and operation of accessibility in MS PowerPoint

PDF

Keep in mind that the foundational Web Accessibility Content Guidelines (WCAG) information are covered in the first level foundational materials. The tool-specific materials focus on how to perform that action in that tool: to create it for accessibility and to test for accessibility.

- Alternate Text
- Reading Order
- Focus Order
- Fonts and Spacing
- Use of Color
- Hyperlinks
- Charts and Graphs
- Watermarks
- Testing
- Tags
- Tables and Markup
- Running accessibility checks and fixing issues:
    - Automatic
    - Manual
- Other training materials as determined by the topic area workgroup to be foundational to state staff understanding and operation of accessibility in PDFs

MS Teams – Basic

Keep in mind that the foundational Web Accessibility Content Guidelines (WCAG) information are covered in the first level foundational materials. The tool-specific materials focus on how to perform that action in that tool: to create it for accessibility and to test for accessibility.

- Writing with accessibility in mind when sending messages and chats
- Basic features of MS Teams for communication:
    - Connecting the accessibility for MS Word, Excel (including Tables), Outlook, PowerPoints, and PDFs apply to use of Teams – Basic for use of the Teams similar features
- Font adjustments in MS Teams chats
- Paragraph spacing and structures in MS Teams chats

Table of Contents

- Descriptive hyperlinks
- Caution with use of blinking, flashing, and animated images
- Running accessibility checks and fixing issues:
    - Automatic
    - Manual
- Other training materials as determined by the topic area workgroup to be foundational to state staff understanding and operation of accessibility in MS Teams - Basic

Meeting Accessibility in MS Teams or Zoom Platforms

Keep in mind that the foundational Web Accessibility Content Guidelines (WCAG) information are covered in the first level foundational materials. The tool-specific materials focus on how to perform that action in that tool: to create it for accessibility and to test for accessibility.

- Existing state resources on virtual meetings for accessibility best practices
- Basic Information for scheduling ASL and CART (and what these are)
- Information from the DIN workgroup developing the listed accessibility features in Zoom and Teams meeting platforms and ratings for each according to meeting accessibility needs of individuals with disabilities
- Running accessibility checks and fixing issues:
    - Automatic
    - Manual
- Other training materials as determined by the topic area workgroup to be foundational to state staff understanding and operation of accessibility in MS Teams or Zoom meeting platforms

Communication Hubs Digital Accessibility

Media (Audio-only, Video-only, and Multimedia)

Keep in mind that the foundational Web Accessibility Content Guidelines (WCAG) information are covered in the first level foundational materials. The tool-specific materials focus on how to perform that action in that tool: to create it for accessibility and to test for accessibility.

- Requirements for Audio-only content to meet WCAG
- Requirements for Video-only content to meet WCAG
- Requirements for Multimedia (Audio plus Video content) to meet WCAG
- Transcription best practices
- Captioning best practices
- Caution with use of blinking, flashing, and animated images or videos
- Running accessibility checks and fixing issues:
    - Automatic
    - Manual

Table of Contents

- Other training materials as determined by the topic area workgroup to be foundational to state staff understanding and operation of accessibility in Media

MS SharePoint Online / MS Teams Channels

Keep in mind that the foundational Web Accessibility Content Guidelines (WCAG) information are covered in the first level foundational materials. The tool-specific materials focus on how to perform that action in that tool: to create it for accessibility and to test for accessibility.

- Best practices
- Designs to meet accessibility standards
- Alternate Text
- Use of Color and Font that is accessible
- Use simple tables and tools within MS Teams and SharePoint for proper programming of a table
- Short titles in headings (less than 20 words or one line long)
- Use of Audio and Video with captions, transcripts, and other required information
- Charts and Graphs use Long Descriptions
- Embedded Documents also Accessible
- Caution with use of blinking, flashing, and animated images
- Running accessibility checks and fixing issues:
    - Automatic
    - Manual
- Other training materials as determined by the topic area workgroup to be foundational to state staff understanding and operation of accessibility in MS SharePoint Online or Teams Channels

Social Media

Keep in mind that the foundational Web Accessibility Content Guidelines (WCAG) information are covered in the first level foundational materials. The tool-specific materials focus on how to perform that action in that tool: to create it for accessibility and to test for accessibility.

- Guidance for Social Media use by State Agencies to meet Accessibility Requirements
- Posts done by third parties on Agency social media, who are not state vendors or contractors doing the post on the agency's behalf: Not the responsibility of the State for accessibility of those posts (we do not control or manage the public)
- Social media posts are included in the digital accessibility requirements from the federal and state laws and policies
- Accessibility checks on the original content of materials planned to post on social media channels
- Additional tips and resources for posting directly into the social media channel when the information is not on a separate original content document
- Running accessibility checks and fixing issues:
    - Automatic

Table of Contents

    - Manual
- Other training materials as determined by the topic area workgroup to be foundational to state staff understanding and operation of accessibility in Social Media

Table of Contents