



OFFICE OF THE CONTROLLER
CITY AND COUNTY OF SAN FRANCISCO

Greg Wagner
Controller

ChiaYu Ma
Deputy Controller

MEMORANDUM

TO: Katharine Petrucione, Acting Director
Committee on Information Technology

FROM: Mark de la Rosa, Director of Audits
Audits Division, City Services Auditor 

DATE: August 28, 2024

SUBJECT: **The City Is Not on Track to Meet Its Digital Accessibility and Inclusion Standard Goals**

EXECUTIVE SUMMARY

In November 2021 the City and County of San Francisco (City) adopted the Digital Accessibility and Inclusion Standard (DAIS), which requires city departments to provide residents and visitors equitable access to all digital services and web content. This assessment by the Office of the Controller (Controller), City Services Auditor (CSA), Audits Division, found that city departments are behind on their efforts to adhere to the implementation schedule of DAIS and that the Committee on Information Technology (COIT) and the City Administrator's Digital Services division (Digital Services) could have better supported departments' efforts to comply with DAIS.

In addition to the local requirement, federal law requires local governments to ensure people with disabilities have an equal opportunity to benefit from their digital content by April 2026. According to COIT, it has limited enforcement authority to require and ensure departments' compliance. The combined efforts of COIT, Digital Services, Mayor's Office on Disability, Office of Civic Engagement and Immigrant Affairs, and all city departments are critical in ensuring that the City's public-facing digital content provides equitable access for city residents and visitors with disabilities.

BACKGROUND, OBJECTIVE & METHODOLOGY

Background


Digital Accessibility and Inclusion Standard. In November 2021 the City adopted the [Digital Accessibility and Inclusion Standard \(DAIS\)](#), which requires city departments to provide residents and visitors equitable access to all public-facing websites, online applications, and digital content run by or for the City. This includes digital content created by departments, commissions, elected officials, employees, consultants, and vendors. DAIS requires the City’s digital content to comply with all city, state, and federal laws and regulations, including Title II of the Americans with Disabilities Act (ADA).¹

DAIS requires all new and existing content to:

1. Follow San Francisco’s equitable design requirements and Level AA of the most recent [Web Content Accessibility Guidelines \(WCAG\)](#).
2. Provide vital information for the public at a fifth-grade level.
3. Provide human translation of vital information in the threshold languages defined by the [Language Access Ordinance \(LAO\)](#).












Exhibit 1 summarizes the requirements of DAIS.

Exhibit 1: Summary of DAIS requirements

Requirement Category	Requirement Description
Web Content Accessibility Guidelines 2.1 Level AA 	<ul style="list-style-type: none"> ▪ These guidelines aim to provide a shared, international standard for web content accessibility that helps meet the needs of people with all types and combinations of disabilities, such as visual, auditory, and neurological disabilities. ▪ The 13 guidelines are organized under four principles of accessibility: perceivable, operable, understandable, and robust. ▪ Each guideline is categorized in three levels of conformance with WCAG: A (lowest), AA (middle), AAA (highest). All city websites must follow the technical requirements of WCAG 2.1, Level AA.

¹ ADA is a federal civil rights law that prohibits discrimination against people with disabilities in everyday activities. Title II of ADA requires local governments to provide people with disabilities an equal opportunity to benefit from all their programs, services, and activities.

Exhibit 1: Summary of DAIS requirements *(continued)*

Requirement Category	Requirement Description						
<p>San Francisco’s Equitable Design Requirements</p> 	<ul style="list-style-type: none"> ▪ The City’s websites must follow equitable design practices that are affordable, secure, and mobile-first. <table border="1" data-bbox="464 411 1422 989"> <tr> <td data-bbox="464 411 646 621"> <p>Affordable</p>  </td> <td data-bbox="646 411 1422 621"> <p>This means that the websites must:</p> <ul style="list-style-type: none"> ○ Minimize the amount of data transfer required to perform basic functions. ○ Minimize the amount of data on each page. ○ Show download size on large documents in advance of download. </td> </tr> <tr> <td data-bbox="464 621 646 737"> <p>Secure</p>  </td> <td data-bbox="646 621 1422 737"> <ul style="list-style-type: none"> ○ The City’s Cybersecurity Policy outlines the technical requirements for making websites secure. </td> </tr> <tr> <td data-bbox="464 737 646 989"> <p>Mobile-First</p>  </td> <td data-bbox="646 737 1422 989"> <ul style="list-style-type: none"> ○ Websites must be designed to be easily accessed on mobile devices. ○ Web pages should replace documents in Portable Document Format (PDFs), which do not work well on mobile devices. At minimum, any PDFs used must be accessible to someone using assistive technology, such as a screen reader. </td> </tr> </table>	<p>Affordable</p> 	<p>This means that the websites must:</p> <ul style="list-style-type: none"> ○ Minimize the amount of data transfer required to perform basic functions. ○ Minimize the amount of data on each page. ○ Show download size on large documents in advance of download. 	<p>Secure</p> 	<ul style="list-style-type: none"> ○ The City’s Cybersecurity Policy outlines the technical requirements for making websites secure. 	<p>Mobile-First</p> 	<ul style="list-style-type: none"> ○ Websites must be designed to be easily accessed on mobile devices. ○ Web pages should replace documents in Portable Document Format (PDFs), which do not work well on mobile devices. At minimum, any PDFs used must be accessible to someone using assistive technology, such as a screen reader.
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<p>Language Access Ordinance</p> 	<ul style="list-style-type: none"> ▪ Requires departments to inform members of the public that they have a right to language assistance to afford them the same quality of information and services as English speakers receive. ▪ Provide vital information* for the public at a fifth-grade level. ▪ Provide human translation of vital information in the following threshold languages: English, Chinese (Traditional Chinese), Spanish, and Filipino. Translation for other relevant languages is encouraged. 						

* Note: Vital information is defined as information about a department’s services or programs, such as applications, forms, or any other written or publicly posted documents related to direct services to the public that could impact the community or an individual seeking services from or participating in a program of a city department.

Source: DAIS

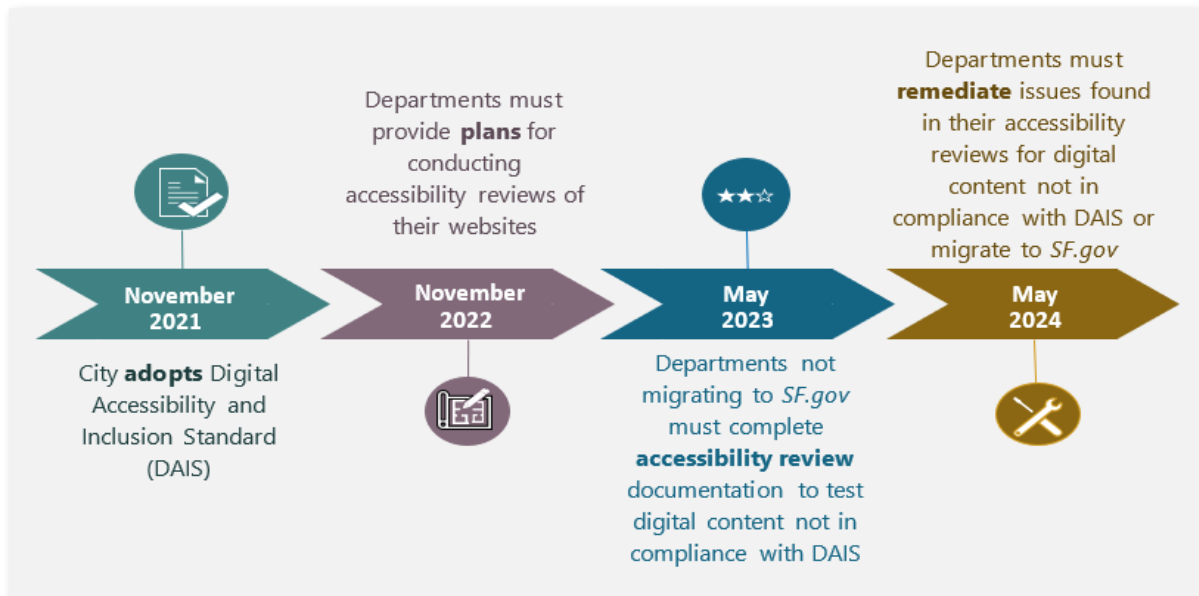
Committee on Information Technology. Composed of 13 department heads that represent each of the City’s major services areas, COIT is the governance body under the Office of the City Administrator that makes decisions for the future of San Francisco’s technology and policies that support strategic goals such as cybersecurity and disaster preparedness. In coordination with Digital Services, the Mayor’s Office on Disability, Office of Civic Engagement and Immigrant Affairs, City Attorney, and the Office of Contract Administration, COIT provides guidance and trainings to city departments on their website accessibility remediation efforts to comply with DAIS. COIT is responsible for assessing compliance with DAIS and for incorporating digital accessibility and inclusion in its evaluation of budgetary requests.

Digital Services. The Office of the City Administrator’s Digital Services team works with departments to improve public services by using digital tools, ensuring an inclusive and equitable experience for

residents. According to Digital Services, in coordination with the Mayor’s Office of Disability and COIT, it consulted with departments to get their input on DAIS and provided templates and guidelines for departments to use in conducting accessibility reviews of their websites. Digital Services is also responsible for departments’ migration to the City’s *SF.gov* domain and to ensure that departmental websites meet DAIS requirements.

DAIS Implementation Schedule. Departments had until May 2024 to ensure that their existing public digital content adheres to the new standards. COIT established an implementation schedule for DAIS, which is summarized in Exhibit 2.

Exhibit 2: COIT’s implementation schedule for DAIS



Source: COIT

Objective and Scope

The objective of this assessment was to evaluate the City’s digital accessibility and inclusion efforts and assist in the evaluation of accessibility reviews, consistent with the requirements of DAIS, which states that the Controller’s CSA will evaluate the City’s digital accessibility and inclusion efforts and assist in the evaluation of accessibility reviews.

This assessment focused on the 30 city departments that indicated to COIT that they would not migrate their websites to the *SF.gov* domain (*SF.gov*) and therefore would conduct their own website accessibility reviews and any needed remediation in accordance with DAIS. The assessment did not include departmental websites that have migrated or are migrating to *SF.gov* as of February 2024, all of which are managed by Digital Services. CSA may determine whether a future audit will be conducted to ensure that departments on *SF.gov* are complying with all requirements of DAIS.

Methodology

To achieve the objective, we:

- Reviewed requirements in DAIS and guidelines developed by COIT and Digital Services to understand departments' responsibilities.
- Obtained a list of departments not migrating to *SF.gov* and planning to assess and implement their own compliance with DAIS.
- Reviewed website accessibility reviews submitted by departments to determine whether they comply with COIT's schedule for DAIS accessibility reviews. Departments were allowed either to conduct their own website accessibility review or to use a third-party vendor to do so.

This assessment is for a nonaudit service. Generally accepted government auditing standards do not cover nonaudit services, which are defined as professional services other than audits or attestation engagements. Therefore, COIT is responsible for the substantive outcomes of the work performed during this assessment and is responsible to be in a position, in fact and appearance, to make an informed judgment on the results of the nonaudit service.

RESULTS

Observation 1: COIT and Digital Services could have better supported departments' efforts to comply with the Digital Accessibility and Inclusion Standard by May 2024.

COIT and Digital Services did not conduct adequate initial outreach to city departments, created templates that omitted some DAIS provisions for departments' accessibility reviews, and did not finalize a pre-qualified vendor pool to facilitate departmental reviews in a timely manner. These are factors that may have caused some departments to fall behind on progress toward the goal that all online and public content meets accessibility standards by May 2024.

In October 2022 COIT sent a survey to 64 city departments to determine which would not be migrating to the *SF.gov* domain. COIT identified 30 departments that were not migrating to *sf.gov* and needed to conduct their own accessibility reviews by May 2023 to identify digital content that must be remediated by May 2024 to comply with DAIS. (Because *SF.gov* is designed to follow all standards outlined in DAIS, any departments already on or moving to that domain are considered in compliance with DAIS.)

Besides the 30 departments discussed above, we found that an additional 9 departments have an unknown compliance status regarding DAIS. Of these 9 departments, 4 were not included in COIT's initial outreach, and 5 initially indicated they would be moving to *SF.gov* but had not started the migration process with Digital Services as of late March 2024.

Digital Services created templates for departments to use as a baseline for their website accessibility reviews. However, departments that used Digital Services' templates might not fully comply with DAIS because the initial templates were incomplete and did not map out:

- Each guideline in WCAG 2.1 Level AA. The issue types in the templates, which address areas of accessibility such as color contrast, either did not include all WCAG 2.1 Level AA guidelines or were not clear as to how the accessibility areas were related.
- Specific applicable provisions in the language access ordinance such as applications or forms to participate in a department’s program or to receive its services.
- Any of San Francisco’s equitable design requirements, specifically the affordability requirement related to data and the security requirement outlined in the City’s Cybersecurity Policy.

Departments not migrating to *SF.gov* may use a vendor to conduct their website accessibility review and remediation to comply with DAIS. However, COIT did not finalize the pre-qualified list of suppliers until after the May 2023 review deadline. Thus, departments that were waiting for the pre-qualified supplier pool to be finalized could not meet the deadline.

Observation 2: 15 of 30 departments had not completed their website accessibility reviews as of February 2024.

Of the initial 30 city departments that indicated that they were not migrating their websites to the *SF.gov* domain, 11 (37 percent) sufficiently completed their website accessibility reviews by the May 2023 deadline. As of February 2024, of the remaining 19 departments:

- 15 did not complete their website accessibility reviews.
- 3 completed their reviews after the May 2023 deadline.
- 1 completed its review but it was based on an outdated standard.

Exhibit 3 summarizes the status of city departments’ compliance with this requirement.

Exhibit 3: Status of city departments’ compliance with website accessibility review requirement as of February 2024

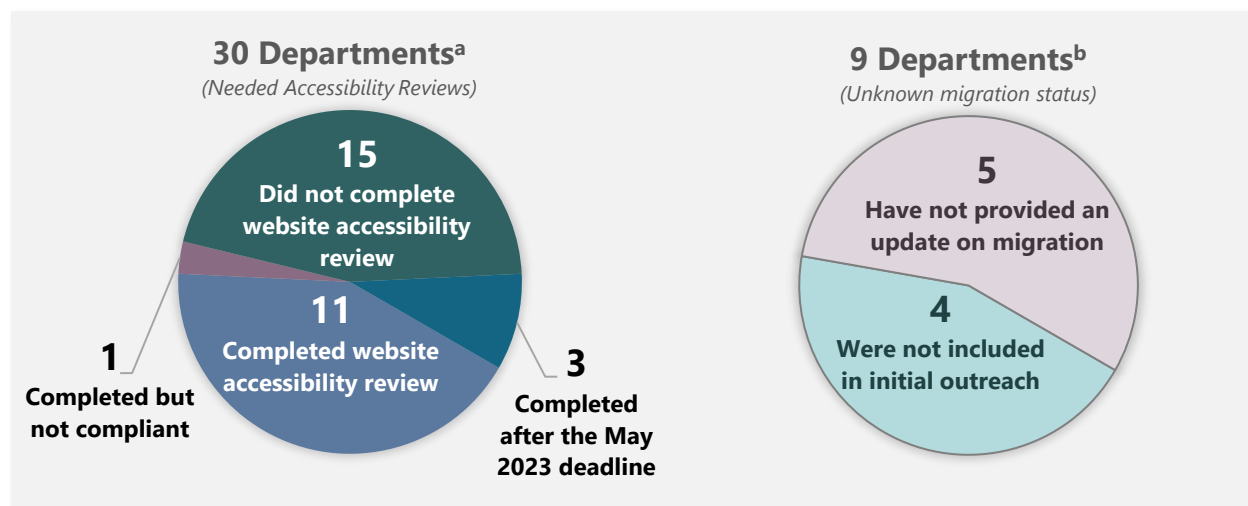


Exhibit 3: Status of city departments' compliance with website accessibility review requirement as of February 2024 *(continued)*

No. of Depts	Compliance Status	Departments
15	Did not complete website accessibility reviews	Animal Care and Control, Arts, Board of Supervisors—Youth Commission, District Attorney, Emergency Management, Environment, Homelessness and Supportive Housing, Human Rights, Municipal Transportation, Public Defender, Public Utilities, Public Health, Recreation and Park, Residential Rent Stabilization and Arbitration, Status of Women
11	Completed website accessibility reviews	Early Childhood, Ethics, Fire, Health Service, Planning, Port, Public Works, Retirement, Sheriff, Treasurer & Tax Collector, War Memorial
3	Completed reviews after the May 2023 accessibility review deadline	Airport, Human Services, Police
1	Completed review but was not compliant	Public Library
5	Did not provide an update on migration	Academy of Sciences, Asian Art Museum, Board of Supervisors, City Attorney, Fine Arts Museums
4	Not included in initial outreach	Assessment Appeals, City Hall Events, Community Investment and Infrastructure, Financial Empowerment

Notes:

^a COIT identified 30 city departments that were not migrating to *SF.gov* in the initial planning phase and needed to conduct their own accessibility reviews.

^b CSA identified 9 departments not on *SF.gov* with unknown statuses for compliance with DAIS. Of these, 5 had originally indicated to COIT that they would be migrating to *SF.gov*, but Digital Services confirmed that these departments had not reached out to start the process as of March 2024.

Source: CSA analysis of documentation provided by COIT

The Public Library (Library) is the department that completed its review but the vendor that conducted the Library's review used WCAG 2.0 as its criteria instead of the more updated WCAG 2.1, Level AA.² The City requires public-facing websites to conform to WCAG 2.1, Level AA, at a minimum. Many departments that are not migrating to *SF.gov* indicated that they could not conduct their website accessibility reviews due to limited time and/or staffing. Thus, departments not migrating to *SF.gov* are lagging on the citywide effort to meet the requirements of DAIS.

In addition to DAIS, the ADA, Title II, is a federal law that requires local governments to give people with disabilities an equal opportunity to benefit from their digital content. This must be done by using WCAG 2.1, Level AA, as the technical baseline by April 24, 2026. However, according to COIT, it has limited enforcement authority to require and ensure departments' compliance. The combined efforts of COIT, Digital Services, Mayor's Office on Disability, Office of Civic Engagement and Immigrant Affairs, and all city departments are critical to ensuring that the City's public-facing digital content provides equitable access for city residents and visitors with disabilities.

² Although it reported its review as completed, the Library demonstrated to us that it was continuing its website accessibility testing as of February 2024.

Recommendations

The Committee on Information Technology should:

1. Work with the Digital Services division to ensure templates provided to departments are complete and include all requirements in the Digital Accessibility and Inclusion Standard, including those related to Web Content Accessibility Guidelines, the language ordinance, and the City's equitable design requirements.
2. Reevaluate and, if needed, change the deadline for the City's digital content to comply with the Digital Accessibility and Inclusion Standard, communicate the current or new deadline to departments, and remind departments to remediate their digital content by the deadline.
3. Remind departments to ensure vendors conducting their website accessibility reviews use the current version of the Web Content Accessibility Guidelines or use Digital Services' current templates for all future reviews.
4. Encourage departments to migrate their websites to the City's *SF.gov* domain if self-compliance with the Digital Accessibility and Inclusion Standard is infeasible.
5. Immediately reach out to departments that stopped engaging with COIT or those that were omitted from the initial outreach process to determine how they will remediate their websites to comply with the Digital Accessibility and Inclusion Standard.

cc: City Administrator
Carmen Chu

COIT
Danny Thomas Vang

Digital Services
Cyd Harrell
Christina Lutz-Hatfield

Mayor's Office on Disability
Jennifer Johnston
Deborah Kaplan

Office of Civic Engagement and Immigrant Affairs
Jorge Rivas

Controller
Greg Wagner
ChiaYu Ma
Amanda Sobrepeña
Snehi Basnet
Sienna Hernandez

Board of Supervisors
Budget Analyst
Citizens Audit Review Board
City Attorney
Civil Grand Jury
Mayor
Public Library

Attachment

Department Response

City & County of San Francisco
London N. Breed, Mayor



Office of the City Administrator
Carmen Chu, City Administrator

August 9, 2024

Mark de la Rosa
Director of Audits
Office of the Controller, City Services Auditor
City Hall
1 Carlton B. Goodlett Place, Room 316
San Francisco, CA 94102

Re: Response to the COIT Digital Accessibility and Inclusion Standard Goals Report

Dear Mr. de la Rosa:

The Office of the City Administrator (CAO) has received the draft of the City Services Auditor's memo on the Committee on Information Technology (COIT) Digital Accessibility and Inclusion Standard Goals. We appreciate the time and effort that your staff spent on the report.

Attached please find CAO's response to the report recommendations, which has been prepared by COIT and Digital and Data Services. If you have any questions regarding the department's response, please contact Deputy City Administrator Katie Petrucione at 415.530.1756.

Sincerely,

A handwritten signature in blue ink that reads "Katharine E. Petrucione".

Katharine E. Petrucione
Acting City Administrator

Attachment

cc: Danny Vang, COIT
Cyd Harrell, Digital and Data Services

Recommendations and Responses

For each recommendation, the responsible agency should indicate in the column labeled Agency Response whether it concurs, does not concur, or partially concurs and provide a brief explanation. If it concurs with the recommendation, it should indicate the expected implementation date and implementation plan. If the responsible agency does not concur or partially concurs, it should provide an explanation and an alternate plan of action to address the identified issue.

Recommendation	Agency Response	CSA Use Only Status Determination*
The Committee on Information Technology should:		
1. Work with the Digital Services division to ensure templates provided to departments are complete and include all requirements in the Digital Accessibility and Inclusion Standard, including those related to Web Content Accessibility Guidelines, the language ordinance, and the City’s equitable design requirements.	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur COIT staff will work with Digital and Data Services (DDS) to update the template by October 1, 2024, to: <ul style="list-style-type: none"> • Define a clear connection to each WCAG 2.1 Level AA criteria. • Include a link to information about the requirements included in the Language Access Ordinance (LAO). The Office of Civic Engagement and Immigrant Affairs (OCEIA) will continue to be responsible for review of compliance with the LAO. • Include basic information about the equitable design requirements. 	<input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested
2. Reevaluate and, if needed, change the deadline for the City’s digital content to comply with the Digital Accessibility and Inclusion Standard, communicate the current or new deadline to departments, and remind departments to remediate their digital content by the deadline.	<input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur COIT staff will review and revise the standard to bring it into alignment with the April 2024 Department of Justice ruling that adopted WCAG 2.1 Level AA as the technical standard for state and local governments, which sets a deadline of April 2026. Any prospective edits to the standard must be reviewed by the Policy Review Board and approved by the Committee on Information Technology. COIT staff estimate that this will be complete by January 17, 2025.	<input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested

* Status Determination based on audit team’s review of the agency’s response and proposed corrective action.

12 | The City Is Not on Track to Meet Its Digital Accessibility and Inclusion Standard Goals

Recommendation	Agency Response	CSA Use Only Status Determination*
	<p>Upon COIT’s approval of the revised Digital Accessibility and Inclusion Standard, COIT staff will communicate the updated deadline to departments and inform them that they must remediate their digital content accordingly. This will occur no later than February 2, 2025.</p>	
<p>3. Remind departments to ensure vendors conducting their website accessibility reviews use the current version of the Web Content Accessibility Guidelines or use Digital Services’ current templates for all future reviews.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>COIT staff will continue to remind departments that the baseline threshold of compliance is WCAG 2.1 Level AA. No later than October 15, 2024, staff will send departments an email with the updated template and a strong reminder to use WCAG 2.1 Level AA when conducting website accessibility reviews.</p>	<p><input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested</p>
<p>4. Encourage departments to migrate their websites to the City’s <i>SF.gov</i> domain if self-compliance with the Digital Accessibility and Inclusion Standard is infeasible.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>COIT staff agree that transitioning to the SF.gov domain can be a streamlined process for departments to come into compliance with digital accessibility best practices.</p> <p>Later this year, SF.gov will be transitioning to a new Content Management System (CMS) and launching a fully redesigned SF.gov website.</p> <ul style="list-style-type: none"> • It has been redesigned to comply with WCAG 2.1 Level AA. • The color palette and typography have been tested for color contrast and logical reading order. • It has been optimized for keyboard accessibility and screen readers. • The site will continue to offer support for the 3 languages defined by the LAO, with the ability to expand to new languages like Vietnamese. 	<p><input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested</p>

* Status Determination based on audit team’s review of the agency’s response and proposed corrective action.

13 | The City Is Not on Track to Meet Its Digital Accessibility and Inclusion Standard Goals

Recommendation	Agency Response	CSA Use Only Status Determination*
	<p>These changes will be happening in early to mid-December. DDS will continue to support DAIS implementation efforts with webinars and helping build out the DAIS SharePoint.</p> <p>COIT staff will include information about the updates to the SF.gov CMS and encourage departments to migrate their websites to the SF.gov domain when it provides the revised DAIS to departments, no later than February 2, 2025.</p>	
<p>5. Immediately reach out to departments that stopped engaging with COIT or those that were omitted from the initial outreach process to determine how they will remediate their websites to comply with the Digital Accessibility and Inclusion Standard.</p>	<p><input checked="" type="checkbox"/> Concur <input type="checkbox"/> Do Not Concur <input type="checkbox"/> Partially Concur</p> <p>No later than October 15, 2024, COIT staff will reach out to departments/divisions that have stopped engaging or were omitted from the initial outreach process.</p>	<p><input checked="" type="checkbox"/> Open <input type="checkbox"/> Closed <input type="checkbox"/> Contested</p>

* Status Determination based on audit team’s review of the agency’s response and proposed corrective action.