Digital Accessibility and Inclusion Standard

Committee on Information Technology

The City and County of San Francisco (City) deploys websites and digital tools to empower and inform its residents, businesses and visitors. ~~San Francisco The City~~San Francisco wishes to create a better online experience for all, including the 95,000 residents with a disability, the 19.5% of residents who identify as Limited English Proficient (LEP), and the 22% of residents who rely on their mobile device ~~for~~to connect to the internet. To serve all San Franciscans effectively ~~T~~the City ~~and County of San Francisco (City) is dedicated to serving all San Franciscans. To do this, we need to give~~must provide equitable access to ~~all of our~~ its digital ~~services and web~~ content. ~~We must consider the need of San Franciscans, City staff, and anyone doing business with the City.~~

PURPOSE AND SCOPE

~~This~~ The Digital Accessibility and Inclusion S~~s~~tandard (DAIS) ~~explains~~ outlines what ~~you need to~~City departments must do to make ~~your~~ their digital information, programs, activities, and services

~~web content and services~~ accessible. ~~We need to design and build services and content that everyone can access and understand.~~

~~These standards~~ The~~is~~ standard ~~apply~~applies to public~~-f~~ facing ~~websites, online applications, and~~ digital content ~~primarily intended for use by City residents and visitors. They apply to:~~that is:

- ~~e~~everything online ~~run by or for~~ operated by or on behalf of the City ~~and County of San Francisco~~, its departments~~,~~ and commissions
- created by or on behalf of ~~digital content created by~~ City elected officials, employees, consultants ~~,~~ and vendors~~.~~
- primarily intended for use by City residents and visitors

STANDARD REQUIREMENTS

City digital content must comply with all City, State, and Federal laws and regulations and with all state and federal Constitutional requirements, including the Americans with Disabilities Act (ADA).

All ~~new~~ City ~~and County of San Francisco websites, online applications, and~~ digital content ~~are required to~~must:

1. ~~follow~~comply with ~~San Francisco's equitable design requirements and Level AA of the most recent~~ the United States Department of Justice (DOJ) Web Content Accessibility Guidelines Version 2.1 Level AA~~;~~.

2. ~~follow~~comply with the City's equitable design requirements and provide vital information (as defined by the San Francisco Language Access Ordinance, Administrative Code Chapter 91) for the public ~~at a 5th grade level~~in plain language. In cases where vital information includes technical or legal language ~~is necessary,~~ ~~you~~ a department ~~must~~ should provide a summary ~~at 5th grade level~~in plain language~~;~~. ~~Vital information is defined by the City's Language Access Ordinance. See Definitions section for more details.~~

3. ~~provide human translation of vital information in the threshold languages defined by the follow~~comply with the ~~San Francisco~~ City's Language Access Ordinance (LAO). ~~This includes clear navigation to translations. Currently these languages are English, Chinese (Traditional Chinese), Spanish, and Filipino. Translation for other relevant languages is encouraged.~~

~~All existing content must follow this standard by May 2024. See Timeline section for details.~~

All City digital content must comply with all City, State, and Federal laws and regulations, and with all state and federal Constitutional guarantees, including , such as the Americans with Disabilities Act (ADA), Section 508 of the Rehabilitation Act, and the San Francisco Language Access Ordinance.

ROLES AND RESPONSIBILITIES

- **City and County of San Francisco Departments**
  - Develop new digital content and remediate existing content following this standard.
  - Identify a DAIS Coordinator, and provide contact information to notify CCommittee on Information Technology (COIT) staff of said individual. This personrole should connectinteract with all relevant internal stakeholders, such as ADA Coordinators, LLAO Liaisons, and communication/technology leads within their department.
  - Publish a website accessibility statement in a visible andn intuitive website location, such as a sitewide footer or the department contact page. The statement must Iinclude the adopted standard, a point of contact, and be translated into the threshold languages.
  - Ensure that City web content and mobile applications comply with federal, state and local disability access laws, including without limitation the DOJ Rule.
  - Ensure that third-party vendors comply with the Web Content Accessibility Guidelines Version 2.1 Level AA when providing or creating web content or digital products tools for the City. Work with the Office of Contract Administration during the bidding and procurement process to ensure that selected vendors' work product meet the City's accessibility requirements are met by vendors.
  - Departments should mayshould consult with their internal Language Access OrdinanceLAO Liaisons on language access best practices. Departments are encouraged to have the quality of written translations of vital information reviewed by bilingual employees who are certified by the Department of Human Resources. If the dDepartment doesn't does not have multilingual staff, they may reach out to the Office of Civic Engagement and Immigrant Affairs (OCEIA) for additional support or should have use quality and accuracy checks from external translators. Departments are encouraged to ask forrequest feedback on translations from bilingual staff at community groups whose clients receive services from the deDepartment. If the translated material involves legal language, Departments are encouraged to ask for feedback from a qualified attorney.

- **Digital and Data Services**
  - Manage the SF.gov domainplatform. Maintain accessibility standards on the SF.gov domain platform by following best practices laid out in this policy.
  - Create guidance materials and provide trainings to City dDepartments for the continued development of digital content and design standards that follow accessibility and equity requirements.
  - Create guidelines for accessibility review.
  - May provide accessibility reviews of dDepartment websites on request. May also suggest resources for outside vendors.
  - Consult on best practices surrounding the Eequitable Ddesign Rrequirements and plain language.
  - Regularly review these standards and recommend updates to COIT as needed.

- **Mayor's Office on Disability**

- ○ Offer guidance to City ~~d~~Departments on ~~how to include~~including users with disabilities in accessibility testing.
  - ○ Provide guidance to City ~~d~~Departments in auditing and remediation of existing content.
  - ○ Consult on best practices and general compliance ~~surrounding~~with the Americans with Disabilities Act and other applicable federal, state and local disability access laws.
  - ○ Manage the exceptions process in alignment with guidance from the April 2024 Department of Justice ruling on the ~~Americans with Disabilities Act~~ADA.
  - ○ Regularly review these standards and recommend updates to COIT as needed.

- **Office of Civic Engagement and Immigrant Affairs**
  - ○ Consult with departments on best practices ~~surrounding~~governing ~~Provide technical assistance to Departments with~~ translation of digital ~~materials~~ content and guidance on the ~~City Language Access Ordinance~~LAO.
  - ○ Supplement department language access needs via Citywide vendor contracts and OCEIA ~~l~~Language ~~s~~Specialists.~~Provide technical assistance to departments in using Citywide contracts with language translation vendors.~~.
  - ○ **~~R~~review department digital content to determine ~~for a~~ vital information ~~designation~~**
  - ○ Oversee department compliance ~~of~~with the ~~Language Access Ordinance~~LAO.

- **Committee on Information Technology ~~(COIT)~~**
  - ○ Gather information from departments to support assessment of ~~Assess~~ compliance with this standard.
  - ○ Incorporate digital accessibility and inclusion in the evaluation of budgetary requests.
  - ○ Update standard ~~within 2 years of the standard's adoption~~ to define digital accessibility and inclusion standards for internal-facing digital content used by City employees and provide~~s~~ a timeline for their implementation.
  - ○ Regularly convene subject matter experts to review and make ~~additional~~ updates to th~~ese~~e standard~~s~~ as needed.
  - ○ Report publicly and regularly on City department compliance with the standard.

- **City Attorney**
  - ○ Work with COIT, Office of Contract Administration, and Mayor's Office on Disability to develop language for City procurement~~s~~ and contracts to comply with this standard.
  - ○ May consult with departments on ~~translation of~~summarizing legal material into plain language~~if needed~~.

- **Office of Contract Administration**
  - ○ Work with COIT, City Attorney's Office, and Mayor's Office on Disability to develop a process for accessibility compliance in procurement and contracting.

- **City Services Auditor**
  - ○ Evaluate City digital accessibility and inclusion efforts and assist in the evaluation of accessibility reviews, as it relates to the Web Content Accessibility Guidelines and the ~~Language Access Ordinance~~LAO.
  - ○ Consult with the Mayor's Office on Disability on compliance auditing for the Web Content Accessibility Guidelines.
  - ○ Consult with ~~the Office of Civic Engagement and Immigrant Affairs~~OCEIA on compliance auditing for the ~~Language Access Ordinance~~LAO.

BACKGROUND

The City and County of San Francisco designs websites and digital tools to empower all San Franciscans. About 95,000 San Franciscans have some kind of disability. Those disabilities can make it difficult to use websites, online applications, and digital content.[1] As well as meet accessibility compliance obligations defined in ADA Title II, we want to build a better online experience for everyone, particularly those who have disabilities or difficulty reading English.

In addition to disability access, there are other equity issues that the City must consider for digital access to be equitable.

- 1 in 3 San Franciscans is an immigrant. With 34.3% of its residents born outside of the U.S., San Francisco is one of the most culturally and linguistically diverse cities in the country.

- 19.5% of San Franciscans identify as Limited English Proficient (LEP). LEP refers to people who do not speak English as their first language. They may also have limited ability to read, write, speak, or understand English. 43.1% of San Franciscans over the age of 5 speak a language other than English at home.

- Low-income residents, seniors, and people who speak a language other than English are less likely to have a high-speed internet connection at home. 22% of residents without high-speed internet rely on their mobile device for internet access.[2] 60% of all visits to SF.gov are made on a mobile device.

CURRENT SUPPORTED TECHNOLOGIESTHE CITY'S WEBSITE – SF.gov

Digital and Data Services (DDS) designs and maintains SF.gov, the City's website. SF.gov allows residents easy access to City information and services and is available to all departments. The design of SF.gov 's design allows access to users offacilitates use by assistive technologies, non-English speakers, and the broader public. SF.gov also follows all standards outlined in this document. Departments are encouraged to work with Digital ServicesDDS to meet the City's accessibility standards through SF.gov.

Requirement 1: Web Content Accessibility Guidelines

STANDARD DETAILS

Pursuant to the April 2024 DOJ Rule, aAll City and County of San Francisco websites digital content, including web content and mobile applications, for the City and County of San Francisco must follow all technical requirements of the most recent Web Content Accessibility Guidelines, Level AA. At time of standard publication this means compliance with Web Content Accessibility Guidelines 2.1, Level AA, and its four principles:

1. **Perceivable – —**Information and user interface components must be shown to users in ways they can perceive.

2. **Operable – –**User interface components and navigation must be operable.

3. **Understandable – –**Information and the operation of the user interface must be understandable.

4. **Robust – –**Content must be robust enough that it can be interpreted reliably by a variety of users, including those using with assistive technologies.

---

[1] https://www.interactiveaccessibility.com/accessibility-statistics
[2] San Francisco Digital Inclusion Survey, 2018. https://sfmohcd.org/digital-equity

In addition, all websites must follow these specific Level AAA requirements:

- *Abbreviations*: A mechanism for identifying the expanded meaning of abbreviations is available.
- *Attachments:* Attachments are accessible to everyone, including users who use assistive technology like screen readers.
- *Editing*: When web content is edited, it is re-tested for accessibility.
- *Help*: Help in context is available.
- *Link text*: Make sure all links are provided at the point in the content at which they're useful without visibly displaying the URL or "here."
- *Pronunciation*: There is a way for identifying pronunciation of words where their meaning is ambiguous.
- *Reduced Motion*: Respect a user's preference for reduced motion.
- *Skip to Main Content*: Allow screen reader users to easily skip repetitive navigation.
- *Unusual Words*: There is a way for identifying definitions of words or phrases used in an unusual or restricted way, including idioms and jargon.
- *User Testing:* User testing is a standard practice for ensuring accessibility.

The Digital Services Accessibility Guide offers details and tips for meeting these requirements.

IMPLEMENTATION TIMELINE

In April 2024 the United States Department of Justice specified that all sState and local governments with a population of 50,000 or more, including San Francisco, will have to be inmust come into compliance with Web Content Accessibility Guidelines 2.1, Level AA the rule's requirements beginning onno later than April 24, 2026. Departments must comply with the following Department of Justice deadlines :

State and local governments with a population of 50,000 or more will have to be in compliance with the rule's requirements beginning on April 24, 2026.

- **1 year**: Within 1 year of the standard's adoption, Departments must have a plan for reviewing existing content for compliance. If a Department develops a plan with the Digital Services team for migration to SF.gov this satisfies the requirement. Departments may consult with the Digital Services team about their accessibility review.

- **1 year 6 months**: Within 18 months of the standard's adoption, Departments must complete their review of existing content for compliance. They should follow Digital Services guidelines for accessibility review.

- **2 years 6 months**: Within two years and six months of the standard's adoption, Departments must correct issues found with existing content. They should follow the Mayor's Office on Disability guidelines for resolving issues. At minimum, this remediation must include a plan to make existing content accessible on request. They must provide a clear way for members of the public to request equally effective access through a Reasonable Modification (as defined through guidelines for ADA Title II).

In addition, no later than April 2026, within **2 years** of the standard's adoption, COIT will approve an update to this standard to:
- that defines digital accessibility and inclusion standards for internal-facing digital content and
- provides a timeline for their implementation.

EXCEPTIONS

Any Eexceptions to the this standard for specific applications or digital content willmust align with those outlined by the Department of JusticeDOJ. The Mayor's Office on Disability will review all exception Rrequests will be reviewed and must be approved by both the Mayor's Office on Disability and the Policy

Review Board (PRB) of the Committee on Information Technology. A dDepartment requesting an exception must provide a written justification.present the reasons why it is needed. Exception requests The Department's request for an exception must include aits plan for providing accommodation or modification to a member of the public n individual upon request.

Requirement 2: Equitable Design Requirements and Plain Language

STANDARD DETAILS – –Equitable Design Requirements

The equitable design requirements listed belowEquitable design make improves websites and services better for all users, including those with disabilities. TheRequirementsy ensure that we include all San Franciscans when providing online services and information. include:

1. **Affordable**
   - Websites must should minimize data transfer required to perform basic functions.
   - Websites must should minimize the amount of data on each page. For example, by not usingeliminating images unless theythat do not directly convey information needed to use the service.
   - Websites should show download size on large documents in advance of download.

2. **Secure**
   - The City's Cybersecurity Policy outlines the technical requirements for making websites secure.

3. **Mobile first**
   - Websites must should be designed to be easily accessed on mobile devices.
   - PDFs should be eliminated in favor of web pages because they 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.

All department websites are required to meet the standards described in this document. Departments not using SF.gov must ensure compliance with these standards.

STANDARD DETAILS – –Plain Language

In alignment with guidance outlined infrom the Ffederal Plain Writing Act of 2010 (Public Law 111-274) and California Government Code, Section 6219, departments should provide vital information (as defined by the San Francisco Language Access Ordinance, Administrative Code Chapter 91) for the public in plain language. Plain language is Writing that is clear, concise, well-organized writing, and follows other best practices appropriate to the subject or field and intended audience. Material is in plain language if members of the public can (1) find what they need, (2) understand what they find the first time they read or hear it, and (3) use what they find to meet their needs.

Requirement 3: Language Access Ordinance

San Francisco's Language Access Ordinance (LAO), Administrative Code Chapter 91, ensures the City provides fair language access. The LAO makes surerequires that:

- All City departments that serveserving the public provide fair language access
- Residents have a way method to report departments out of compliance with that don't follow the law
- Departments can self-report that they are following the law

The Office of Civic Engagement and Immigrant Affairs ~~(OCEIA)~~ oversees LAO compliance to support ~~.~~ ~~Their goal is to~~ better service to~~e~~ San ~~F~~rancisco residents with limited English. This includes review of department digital content to confirm ~~for a~~ vital information ~~designation~~.

COMPLIANCE

The ~~Americans with Disabilities Act~~ (ADA) requires that local governments make online content ~~be~~ accessible to people with disabilities that impact their ability to access online websites, applications, and documents. ~~Section 508 of the Federal Rehabilitation Act~~ with the Web Content Accessibility Guidelines (WCAG). The COIT Digital Accessibility and Inclusion Standard follows WCAG 2.1, Level ~~AA~~as the most recent version of such guidelines and sets a higher standard.

~~San Francisco's~~The Language ~~Access O~~rdinance requires City d~~D~~epartments to translate written materials that provide vital information to the public about ~~the d~~Department's services or programs. ~~They need~~Material must ~~to~~ be translated into the languages spoken by a Substantial Number of Limited English-~~-~~Speaking Persons as defined by the Administrative Code. ~~The Office of Civic Engagement and Immigrant Affairs notifies Departments when a language is recognized as spoken by a Substantial Number of Limited English Speaking Persons.~~

RESOURCES

- Digital Services Accessibility Guide: Technical guidance for website accessibility.
- Digital Services Accessibility Tools and Resources: Collection of resources for testing and developing accessible content. It includes services to test accessibility and resources on creating accessible products, such as~~like~~ pdfs.
- Digital Services Content Principles and Style Guide: Guidance for writing accessible website content.
- Digital Services Visual Style Guide: Guidance for accessible website style.
- Office of Civic Engagement and Immigrant Affairs Language Access Ordinance Resource Library: Resources for language translation and compliance with the Language Access Ordinance, including recommended vendors.
- Hemingway App: Reviews reading level of written content and provides suggestions.
- Reasonable Modification Policy: Explanation of the City's Reasonable Modification Policy and process for implementation.

DEFINITIONS

Digital Content: As defined in Section 508 of the Rehabilitation Act**,** all types of electronic information, including multimedia, electronic documents, social media, and web content.
~~Applications: The term applications refers to application software, or a software that performs a task for a user.~~
Mobile Applications: As defined in Title II of the ADA*,* software applications that are downloaded and designed to run on mobile devices, such as smartphones and tablets.
Plain Language: As defined in the federal Plain Writing Act of 2010 (Public Law 111-274), plain language is clear, concise, well-organized writing and follows other best practices appropriate to the subject or field and intended audience. ~~plain language is Writing that is clear, concise, well-organized, and follows other best practices appropriate to the subject or field and intended audience.~~
Public Facing: As defined in Section 508 of the Rehabilitation Act~~, c~~, con~~n~~tent made available by a department to members of the general public. Usually, public facing content is published on the web (for example, on a department website, blog, form, or social media page). However, public facing content might also be made available in non-web formats, such as information displayed on screens or interactive

kiosks in waiting areas. Digital content in a password-protected website or secure account that is accessible by City contractors does not fall under this definition.

Vital Information: As defined ~~in city code (the~~by the ~~City's Language Access Ordinance~~), vital information about a d~~D~~epartment's services or programs includes: applications or forms to participate in ~~a~~ d~~D~~epartment~~'s~~ program~~s~~ or activiti~~e~~s~~y~~ or to receive ~~its~~ benefits or services; written notices of rights to, determination of~~,~~ eligibility for, award of, denial of, loss of, or decreases in benefits or services, including the right to appeal any d~~D~~epartment's decision; written tests that do not assess English language competency, but test competency for a particular license or skill for which knowledge of written English is not required; notices adv~~ising~~ertising Limited English~~--~~Speaking Persons of free language assistance; materials, including publicly-posted documents, explaining a d~~D~~epartment's services or programs; complaint forms; any other written 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 d~~D~~epartment.

Web Content: As defined in Title II of the ADA, the information and sensory experience to be communicated to the user by means of a browser, including code or markup that defines the content's structure, presentation, and interactions. Examples of web content include text, images, sounds, videos, controls, animations, and conventional electronic documents.

REFERENCES

Department of Justice Ruling on Americans with Disabilities Act
Web Content Accessibility Guidelines 2.1

San Francisco Language Access Ordinance