Town of Keystone Digital Accessibility Plan

Effective July 1, 2025

1. Introduction

1.1. Purpose of the Accessibility Plan and Commitment to Digital Inclusion

The purpose of this Accessibility Plan is to express the Town of Keystone's ongoing commitment to serving residents and visitors of all abilities. This Plan outlines our approach to improving digital accessibility and reflects the Town's core values of inclusion, equal access, and compliance with state and federal accessibility laws. It provides a clear, structured path for making the Town's digital tools and online services more usable for everyone, including people with disabilities.

The Town of Keystone is dedicated to meeting the needs of individuals with disabilities and fully supports the Americans with Disabilities Act (ADA) across all public facilities, programs, services, and activities. It is the Town's goal to ensure that its website and other public-facing digital platforms meet the Web Content Accessibility Guidelines (WCAG) 2.2 at the A and AA levels.

1.2. Scope: Information and Communication Technology (ICT) in active use

This Accessibility Plan applies to Information and Communication Technology (ICT) in active use. Active use is defined by the Governor's Office of Information Technology's Rules Establishing Technology Accessibility Standards, 8 CCR 1501-11 ("Technology Accessibility Standards"). In general, "active use" refers to technology that is currently relied upon to deliver or support public services and internal operations. For public-facing ICT, this includes any systems or platforms actively used by members of the public to apply for, access, or participate in the Town's services, programs, or activities. For internal-facing ICT, it includes tools and systems currently used by employees to perform their official job functions. This plan focuses exclusively on the authorized, official versions of ICT in active use. It does not cover outdated or superseded versions, archived content, records maintained for historical or legal purposes, working drafts, or other deliberative materials.

2. Annual Review and Update Process

2.1. Timeline for annual updates

This Accessibility Plan will be reviewed and updated annually to reflect progress in enhancing digital accessibility and to adjust priorities in response to new technologies, user feedback, and the Town's evolving needs. The Town will make every effort to complete updates to the Plan by July 1 of each calendar year.

2.2. Responsible office or personnel for plan maintenance

The Town Clerk's Office is responsible for plain maintenance.

2.3. Summary of progress since the previous Plan

This section will be completed on the next Plan update.

3. ICT Prioritization Framework

The Town has developed a prioritization framework to address accessibility across its ICT systems in active use. Work on the Town's digital accessibility plan began in 2024 following incorporation. As part of this effort, a comprehensive website audit was conducted to evaluate compliance with the Web Content Accessibility Guidelines (WCAG) and to inform the development of the accessibility plan. A representative sample of web pages was evaluated for WCAG compliance. Based on these evaluations, the Town developed a prioritization framework. The Town's prioritization framework focuses first on remediating public-facing ICT, beginning with the main website. Priority was given to ICT used by large segments of the public. Subsequently, the Town addressed public-facing systems used by smaller populations, and it is now shifting focus to internal systems with high user volume. Internal ICT used by a limited number of users has been assigned the lowest priority within the framework.

4. Barrier Removal Strategies

In line with its approach to improving digital accessibility, the Town has put in place several strategies to identify and remove barriers across its digital systems. These efforts support equitable access to online services and information for individuals with disabilities, and align with the Web Content Accessibility Guidelines (WCAG) and other applicable accessibility laws and standards.

4.1. Prominent Notice and Accommodation Process

As a proactive step, the Town has posted a clearly visible accessibility notice on its website. This notice provides information for individuals with disabilities on how to request reasonable accommodations or modifications, as well as how to report any digital accessibility issues. It includes two direct contact options—email and phone—so users can easily reach Town staff who are familiar with the accessibility features and limitations of the Town's digital services.

4.2. Replacement of Non-Compliant ICT

Due to the Town's recent incorporation, the Town has prioritized focusing on the purchasing process of ICT to ensure compliant ICT sources are being procured and utilized.

4.3. Vendor Engagement and Remediation Requests

Recognizing the role of third-party software providers, the Town has actively engaged vendors responsible for ICT products and services to address any identified accessibility issues. Vendors were formally notified of specific WCAG violations and requested to

provide timely remediation or a timeline for remediation. The Town has experienced positive collaboration with many vendors, several of whom have responded by improving the accessibility of their products.

4.4. Internal Remediation Efforts

In addition to vendor coordination, the Town has undertaken its own remediation efforts. To address PDF accessibility barriers, for example, the Town has acquired licenses for PDF remediation software and trained staff on its use. This enables the Town to improve the accessibility of documents in-house and respond more quickly to emerging needs.

4.5. Undue Hardship, Undue Burden, Fundamental Alteration, or Direct Threat

In accordance with the Technology Accessibility Standards, there may be limited circumstances in which the Town is unable to remediate or replace ICT in active use. These exceptions may apply when such actions would result in undue hardship, undue burden, fundamental alteration, or direct threat. When such situations arise, the Town will conduct a case-by-case evaluation of the specific ICT in question. In these situations, the Town will carefully evaluate the ICT in terms of the standards established by the Technology Accessibility Rules to make those determination. The evaluation will consider factors including the resources of the program, services, or activity; contractual, legal, regulatory, or technical constraints; available alternatives; the impact on service delivery; and whether the ICT is essential to the operation of a Town program or service. In cases where full compliance is determined to be infeasible due to one or more of these exceptions, the Town maintains documentation to support the rationale for the determination and will take alternative steps, where possible, to ensure service or program access. This may include offering the information or service through an alternate format, method, or communication channel that provides individuals with disabilities an equivalent experience or access. The Town Manager is responsible for approval of these exceptions.

4.6. Procurement Practices

5. Timelines for Accessibility Improvements

Digital Accessibility is a core consideration in the Town's procurement practices. When a new ICT service or product is being purchased, the Town evaluates digital accessibility as part of its purchasing. When initiating the procurement of ICT system—such as software, hardware, web applications, or third-party digital services—the Town integrates digital accessibility criteria into the procurement evaluation. This includes:

- Requiring Accessibility Documentation: Vendors are asked to submit a current Voluntary Product Accessibility Template (VPAT®) or an equivalent accessibility conformance report that details how their product or service aligns with recognized accessibility standards.
- Third-Party Accessibility Audits: In cases where VPATs are unavailable, incomplete, or insufficient, the Town may request that an independent accessibility expert audit the ICT

product or service to assess compliance and identify potential accessibility barriers before procurement decisions are finalized.

- Accessibility as a Decision Criterion: Accessibility is not considered an optional feature, but a weighted factor in the evaluation and selection of vendors. ICT products or services that fail to meet baseline accessibility expectations may be disqualified unless no accessible alternative is available and appropriate accommodations can be provided.
- Ongoing Vendor Engagement: The Town engages with vendors throughout the procurement lifecycle to ensure that accessibility requirements are understood and implemented. This includes setting expectations for accessibility remediation timelines, user support, and documentation.
- Procurement Policy Alignment: The Town's procurement policies and templates are formatted—including Requests for Proposals (RFPs), contracts, and evaluation rubrics—with accessibility best practices to ensure consistency and accountability across departments.

The Town considers its ICT prioritization framework in conducting its evaluation of ICT purchases. While these steps guide procurement practices, not all ICT purchases involve every step or strategy, depending on factors such as public exposure, scope, or system complexity. Through these practices, the Town reinforces its commitment to providing inclusive digital services and reducing the need for costly retroactive remediation.

6. Reasonable Accommodations and Modifications

Individuals who encounter barriers while using the Town's ICT—such as websites, online forms, digital documents, or software applications—may request accommodations or modifications to access the content or services in an alternative manner. Examples of accommodations may include providing information in accessible file formats, offering assistance through an alternative communication channel, or enabling access to assistive technologies.

6.1. Procedures for Requesting Accommodations

Requests for reasonable accommodations related to digital accessibility can be submitted in multiple ways to ensure convenience and accessibility.

Requests can be submitted to the Town through any of the following means:

Phone: 970-450-3500x1

E-mail: clerk@keystoneco.gov

Visitor Address: 1628 Sts. John Rd Keystone, CO 80435

7. Ongoing Monitoring and Continuous Improvement

Barrier removal is ongoing effort. The Town continues to evaluate ICT and incorporates accessibility reviews into procurement, design, and content update processes. This continuous improvement approach helps ensure long-term accessibility compliance and usability for all residents.