



OFFICE OF  
ACCESSIBILITY  
STRATEGIC  
**PLAN**

NOVEMBER 2018

# CONTENTS

---

## **Executive Summary..... 1**

Office of Accessibility vision statement .....	2
Office of Accessibility mission statement .....	2
Scope .....	2
Rationale for accessibility.....	4
Strategic plan structure.....	5
High-risk strategies and milestones .....	7

---

## **Chapter 1: Partner for Success..... 10**

Strategy 1: Promote accessibility governance as a multi-level, shared responsibility.....	10
Strategy 2: Use strategic partnerships to improve accessibility .....	13
Strategy 3: Establish statewide standards and policies that support accessibility.....	15

---

## **Chapter 2: Proactive Risk Management ..... 16**

Strategy 4: Build accessible applications and websites.....	16
Strategy 5: Buy accessible systems and services.....	18
Strategy 6: Update existing systems for accessibility .....	20
Strategy 7: Create accessible content .....	21
Strategy 8: Conduct continuous risk assessments .....	22
Strategy 9: Communicate accessibility risks to agency leaders .....	23
Strategy 10: Educate employees about the value of accessibility.....	24

---

## **Chapter 3: Improve and Increase Internal Capacity for Accessibility ... 26**

Strategy 11: Enterprise resources for testing and remediation .....	26
Strategy 12: Improve our understanding of the IT environment.....	27
Strategy 13: Well-defined protocols for integrating accessibility checks.....	29
Strategy 14: Training curriculum for every major subject area.....	30
Strategy 15: Develop and maintain statewide accessibility knowledge center .....	31

---

## **Citations..... 32**



# Executive Summary

The Minnesota Office of Accessibility (“the Office”), housed within Minnesota IT Services (MNIT), aligns its strategic plan with key statewide priorities, notably:

- Legislature: [16E.03, subd. 9](#), which charges the state’s Chief Information Officer (CIO, e.g., MNIT Commissioner) to “develop accessibility standards” and “shall require state agencies to adhere to the standards.”
- Governor Dayton: [Executive Order 14-14](#), which calls for all state agencies to improve their hiring and retention of people with disabilities.
- MNIT’s [Priorities](#), particularly “Modernization: Empower Our Business Partners through Technology,” in which the state is structured to provide fully accessible digital services for its citizens and employ people with disabilities at all levels of operations.

These priorities exist because everyone – including people with disabilities – deserves equal access to state services and opportunities.

Given that state statute requires executive branch agencies to adhere to the accessibility standards, the Office of Accessibility was developed to support agencies’ efforts. Initially, the legislature also established governance of the standard through the Technology Accessibility Advisory Committee (TAAC). After the TAAC sunset, MNIT moved the committee within the MNIT governance structure.

The Office’s primary role is to help state agency leaders understand and manage complex technology risks and benefits. The ultimate goal of information technology is to enhance the lives of citizens and improve the state’s productivity. These two roles help drive the Office’s vision and mission.




---

## Office of Accessibility vision statement

*"The Office of Accessibility's vision is that all Minnesotans: citizens, employees, and customers are able to take advantage of the benefits digital technology has to offer. All state-provided documents, web pages, programs, and systems are accessible and usable<sup>1</sup> by employees and citizens. Where an employee or citizen encounters accessibility or usability barriers, there are readily usable workarounds."*




---

## Office of Accessibility mission statement

*"The Office of Accessibility works with Minnesota agencies to develop policies and implement processes and best practices that helps ensure agencies buy, build, and create accessible products and services. When fully accessible and usable information technology is not readily available, the Office of Accessibility helps the state's leaders understand how to best mitigate risk and take proactive steps toward improving the state's accessibility posture."*

While the state has improved the accessibility of its products and services since the statute was enacted in 2009, much more needs to be done. This strategic plan reviews the issues and presents a plan toward a more accessible and inclusive state government.




---

## Scope

The accessibility and usability statute focuses on the executive branch. That encompasses:

- Nearly 80 agencies, boards, and commissions
- Approximately 35,000 employees
- Over two million web pages
- Over 4,000 IT products and services under MNIT's management, not counting those bought by agencies outside of MNIT's processes

Regarding employees with disabilities:

- Just under 7 percent of state employees identify as having a disability<sup>2</sup>
- Of the quarterly cohorts of new employees in 2017 and 2018, between 5.2 and 8.3 identify as having a disability
- Employees with disabilities leave state employment at about half the rate of new hires

While the Office's efforts focus on executive branch agencies, information and resources are available to other state entities as well as the general public. Whenever possible, the Office publishes its output, including training, guidance, and other resources on its public website. Those external services include:

- Web-based training such as how to create accessible Word documents
- Handouts and resource materials from presentations
- Support and training for accessibility coordinators
- Guidance on buying accessible products and services
- Guidance to vendors on providing information on the accessibility of their offerings
- Best practices, advice, and counsel on processes and procedures
- Monthly newsletters and blog posts

In addition to a staffed Office of Accessibility led by a Chief Information Accessibility Officer (CIAO), there are accessibility staff distributed throughout agencies. Agencies have up to two accessibility coordinators (AC). One AC works for the agency, while the other works for the agency's MNIT partner.

The strategic plan impacts:

- Statewide applications and services used by all state employees as well as citizens
- Agency websites and digital content
- Internal programs used by state employees
- Documents and forms created by state employees for use by other employees and citizens
- Any other digital programs and content created by or for state agencies



---

## Rationale for accessibility

As noted earlier, state law requires executive branch agencies to have and implement an accessibility standard.

On a national scale, the Americans with Disabilities Act (ADA) has become increasingly visible in public and civic life. Title III (governing public access) lawsuits have increased over 30 percent each of the past few years, consistent with the past decade's trajectory.<sup>3</sup> While Title II (state and local governments) suits have not been as visible in the general press, they also continue to grow. Citizens have come to view digital accessibility as a civil right. It is included in the US Department of Justice's Civic Access program. The Winn-Dixie and City of Denver cases, like others before it, have raised the profile of website access. And as the state continues to pursue a more diverse workforce, employees require more effective access to their job tools. Accessibility isn't just about enabling citizen access – it's also about ensuring that the state is able to provide a competitive, equitable workplace. Consider:

- One in four of today's 20-year-olds will become disabled during their career<sup>4</sup>
- The labor market is projected to experience historically low growth for the near future<sup>5</sup>

People with disabilities are chronically underemployed. In 2017, 35.9 percent of people with disabilities aged 18-64 were employed, compared to 76.6 percent of people without disabilities.<sup>6</sup> To retain current staff and attract future talent, the state will need to seek every advantage in a competitive job market. People with disabilities are a ready, willing, and capable resource. Making the state a good place for all to work is not just the right thing to do – it is good business.

For accessibility to be effective, it needs to be achievable in terms of cost and other resources. This means building accessibility into the process and not as an afterthought. For example, imagine an agency hiring a contractor to build a new office building, then discovering after completion that all entrances were above grade and used stairs. Then imagine that the solution to this accessibility issue was to build a ramp next to the loading dock. In spite of the fact that the building was technically "accessible," the result proves to be both impractical and unusable by wheelchair users. As a result, the agency is required to not only pay a significant fine but also invest substantial sums to rebuild the front entrance to make it equally useful for both ambulatory and wheelchair users.

For digital accessibility, a common example is buying software without first testing for accessibility. The result is that after learning that employees and customers can't effectively use the product, fixing the accessibility issues ends up dramatically increasing the product's overall cost.

The practice of accessibility is both a means of enabling usability by citizens and a tool to reduce agencies' risk level.

The Minnesota Department of Human Rights reports that the highest number of discrimination complaints they receive is disability related.<sup>7</sup>



---

## Strategic plan structure

This Office of Accessibility Strategic Plan prioritizes the initiatives for ensuring the state's digital environment is accessible and usable. It identifies 15 major strategies that MNIT and the Office of Accessibility plans to achieve over the next five years, resources permitting. The plan highlights specific implementation actions for fiscal year 2019 and the next five years.

This strategic plan's success is dependent on obtaining the resources identified within the five-year actions and milestones. Items listed within the one-year period are achievable through existing resources. Some, but not all, of the five year milestones, are achievable without additional resources.

The plan organizes the strategies and their milestones in three chapters. The chapters are not listed in any particular order and are considered equally important.

## Chapters

- **Partner for success** (Chapter 1), which involves building formal relationships with other entities that are part of the broader digital accessibility ecosystem
- **Proactive risk management** (Chapter 2), which includes actions to prevent adverse accessibility events
- **Improve internal capacity** (Chapter 3), which includes actions to increase the capabilities of the state’s ongoing accessibility posture

The major strategies are not mutually exclusive. Many key initiatives address multiple strategies. It is also important to pay particular attention to the gap between five-year actions and current year milestones. Addressing this gap will require assistance from policymakers and agency leaders, who are ultimately accountable for digital accessibility and authorize spending levels for the state’s accessibility program.

It also is important to focus on actions that will not succeed without additional resources, whether that be funding, people, tools, executive support, or a combination of these factors. Those actions are labeled high-risk events, denoted with a special warning sign  and the text **[Risk]**. High risk is used when resource constraints presents a significant risk to the success of the strategy. All strategies are critical to a successful accessibility program, so lack of appropriate resources can severely limit the program’s scope and achievement.

These resource constraints also make it necessary to classify many extremely high-risk areas as five year strategies, rather than items to address during the current fiscal year. Simply because a milestone is not denoted as high-risk does not mean it isn’t critical to the plan’s success. For example, even though the milestone “Support and nurture communities of practice” for strategy 13 is not labeled high risk, failure to do so will result in stagnant operations and the risk of declining into ineffectiveness.

Keep in mind that this strategic plan and the milestones are at a high level. The Office will work with its partners to develop more detailed tactics and workplans that focus on how to achieve the milestones.

Below is a synopsis of extremely high-risk milestones, along with a reference to their location in the plan.



## High-risk strategies and milestones

The milestones that are deemed at risk of being achieved within the time frame due to lack of resources (financial, personnel, or technology) or agency support.

(Asterisk before chapter item indicates first-year milestone)

CHAPTER	STRATEGY	MILESTONE
Chapter 1: Partner for Success	Strategy 1: Promote Accessibility Governance as a multi-level, shared responsibility	⚠ [Risk] Monitor strategic plan milestones and work with the TAAC to identify and obtain resources necessary to achieve plan goals.
Chapter 2: Proactive Risk Management	Strategy 4: Build accessible applications and websites	⚠ [Risk] Integrate accessibility through appropriately trained personnel into all application development planning projects
Chapter 2: Proactive Risk Management	Strategy 4: Build accessible applications and websites	⚠ [Risk] Implement website design and build review process that includes the Office of Accessibility
Chapter 2: Proactive Risk Management	Strategy 4: Build accessible applications and websites	⚠ [Risk] Provide comprehensive statewide application and website testing toolbox
Chapter 2: Proactive Risk Management	Strategy 5: Buy accessible systems and services	⚠ [Risk] Develop statewide procurement policies in partnership with agencies, particularly the Department of Administration.

CHAPTER	STRATEGY	MILESTONE
Chapter 2: Proactive Risk Management	Strategy 5: Buy accessible systems and services	⚠ [Risk] Integrate accessibility through appropriately trained personnel into all application development planning projects
Chapter 2: Proactive Risk Management	Strategy 5: Buy accessible systems and services	⚠ [Risk] Implement vendor-based testing and reporting requirements in all contracts above a designated threshold
Chapter 2: Proactive Risk Management	Strategy 6: Update existing systems for accessibility	⚠ [Risk] Integrate accessibility through appropriately trained personnel into all applications planning and upgrade processes
Chapter 2: Proactive Risk Management	Strategy 7: Create accessible content	⚠ [Risk] Establish statewide SharePoint deployment and training guidance and management
Chapter 2: Proactive Risk Management	Strategy 8: Conduct continuous risk assessments	⚠ [Risk] Integrate the exception automation process into all digital procurement operations
Chapter 3: Improve Internal Capacity for Accessibility	Strategy 11: Statewide resources for testing and remediation	⚠ [Risk] Provide comprehensive applications and website testing suite, with training and guidance
*Chapter 3: Improve Internal Capacity for Accessibility	Strategy 12: Improve our understanding of the IT environment	⚠ [Risk] Engage with MNIT leadership for inclusion in services planning

CHAPTER	STRATEGY	MILESTONE
Chapter 3: Improve Internal Capacity for Accessibility	Strategy 12: Improve our understanding of the IT environment	 [Risk] Automate the exceptions process in alignment with updated state standard
Chapter 3: Improve Internal Capacity for Accessibility	Strategy 12: Improve our understanding of the IT environment	 [Risk] Categorization of ultra-high-risk systems into “sunset” and plan for replacement



## CHAPTER 1: Partner for Success

While the Office of Accessibility is housed within MNIT, it is inherently an inter-agency entity. It serves as facilitator to interagency teams in order to design and implement statewide strategies and practices.

The Office of Accessibility currently consists of two full-time employees. To be successful on a statewide level, it must operate within a network of partners, supporters, and resources. Key elements of that network within the state include, but are not limited to:

- Accessibility coordinators (AC)
- Communities of practice (CoP)
- Technology Accessibility Advisory Committee (TAAC)
- MNIT Communications

In addition to internal partners, the Office leverages external partners on both a formal and informal basis to both define and drive best practices and standards. The strategies in this chapter seek to improve the feedback loop between the Office of Accessibility and its internal and external partners.



---

### **Strategy 1: Promote accessibility governance as a multi-level, shared responsibility**

Accessibility governance is more than a management role. In order for accessibility to be accepted and supported throughout the state as part of everyday operations, governance must operate on multiple levels. The advisory committee sets the high-level strategies based in large part on information from the office of accessibility and the accessibility coordinators. In turn, the accessibility coordinators focus on departmental and agency strategies and implement them in their daily operations.

**The Technology Accessibility Advisory Committee (TAAC)** is a cross-agency strategic governance team with representatives of three member groups:

- MNIT
- Agencies representing people with disabilities
- Executive branch agencies

All members are executives at their respective agency. The TAAC works with the Office of Accessibility to set the statewide strategic direction for accessibility.

**Accessibility coordinators (AC)** are individual experts at one or more aspect of digital accessibility. Each agency should have at least one coordinator, teamed with a coordinator from its MNIT partner. Ideally, the coordinators:

- Lead their agency’s accessibility team, which consists of representatives from all agency sectors and employment groups (currently few agencies have such committees)
- Collectively monitor the state’s accessibility temperature
- Work closely with the Office of Accessibility to identify and implement the tactical actions that support the TAAC’s strategic direction

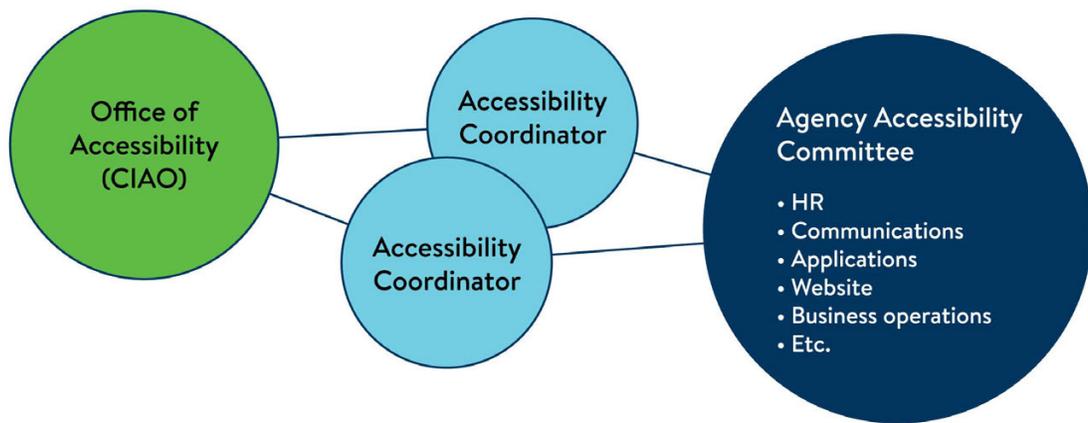


Figure 1. Coordinator schematic. Accessibility coordinators lead their agency accessibility committee or team and serve as liaisons with the Office of Accessibility. Agency committees typically include a range of representatives from a variety of divisions such as HR, communications, applications, websites, and so on.

A characteristic of agencies who support accessibility is that they recognize the value of coordinators, who have highly visible roles and the demonstrated support of leadership. A key component of this strategy is to work with agencies to promote the coordinators' roles along with clear expectations and deliverables.

**Communities of practice (CoP)** focus on a specific technology or practice to design and develop best practices to ensure accessible operation.

### **Governance: FY 19 actions**

- Continue to collaborate with the TAAC to develop the long-range strategy for the Office of Accessibility
- Continue to lead the statewide Accessibility Coordinator workgroup as they carry out the day-to-day strategic and tactical actions that support accessibility
- Continue to lead ongoing interagency accessibility-focused communities of practice as they define and develop guidance and best practices for their field, including:
  - PDF
  - InDesign
  - Maps
  - eLearning

### **Governance: Five year actions**

-  [Risk] Monitor strategic plan milestones and work with the TAAC to identify and obtain resources necessary to achieve plan goals
- Work with agencies to formally define the roles of their coordinators
  - Help them establish and support accessibility teams within agencies
  - Partner with human resources and training coordinators to provide access to coordinator-specific training
- Lead training programs to get coordinators certified as accessibility professionals
- Increase the visibility of coordinators as statewide resources
- Continue working with existing accessibility communities of practice
  - Improve their visibility among state employees and increase participation

- Establish and support additional communities of practice as needed, including:
  - Website design and development
  - Application development
  - Optical character recognition (OCR) and multifunction devices
  - Quality assurance (QA) for accessibility
  - Business analysis (BA) for accessibility



## Strategy 2: Use strategic partnerships to improve accessibility

While digital accessibility as a practice is well-defined, with strong international roots, it is relatively immature as a profession. Few vendors have well-established accessibility practices. As a result, the state often faces situations such as having to buy software in which none of the available vendors demonstrate accessibility knowledge. To make matters worse, they make claims such as “no other state asks us these kinds of questions.”

To address this gap, the Office of Accessibility partners with associations, states, and other organizations to nurture the accessibility ecosystem in order to build better resources for the state.

Internally, the Office of Accessibility needs to better integrate its operations with other MNIT and related administrative operations so that accessibility is built into state systems rather than acting as a bandage. This strategy also leverages other strategies such as training (strategy 14) and knowledge center (strategy 15) to distribute and share information.

MNIT operations are distributed as agency partners. Each MNIT partner is led by a Chief Business Technology Officer (CBTO). CBTOs and the agency leaders they work with need to understand and support accessibility, as their leadership is critical for accessibility to succeed at the agencies. In particular, the CBTOs need to work closely with and support their accessibility coordinators.

Externally, the Office of Accessibility needs to formalize relationships with current and new partners by collaborating on training and certification programs and other activities. We particularly need to build stronger relationships with other states if we’re going to get vendors and other partners to improve their support for accessibility.

This strategy seeks to build partners within agencies as well as outside the state in order to:

- Increase our knowledge and awareness of the accessibility landscape
- Grow internal capacity
- Increase effectiveness of accessibility operations
- Raise the profile of Minnesota achievements and successes

### **Strategic partnerships: FY 19 strategies**

- Improve intake mechanisms and processes such as the web form on mn.gov to reduce manual processing and increase coordination between agencies
- Complete a procurement workgroup in partnership with the Department of Administration to develop recommendations for better integration of accessibility into the procurement process
- Continue to sponsor membership in the International Association for Accessibility Professionals (IAAP) for the state
- Continue to present at key conferences such as CSUN and to provide webinars through partners such as the Great Lakes ADA Center
- Continue to share MN tools and best practices with other states and the federal government, establishing Minnesota as a national leader
- Continue to work with the Disability Agency Forum to identify and address issues impacting people with disabilities

### **Strategic partnerships: Five year actions**

- Collaborate with the Department of Administration and other agencies to integrate accessibility into all phases of the state procurement processes
- Seek out and improve relationships with external disability organizations
- Collaborate with other states to promote procurement guidelines and best practices and present a “united front” with vendors
- Integrate the Office of Accessibility into planning and design of MNIT service delivery and training programs
- Partner with MNIT divisions in service delivery and support
- Improve collaboration between CBTOs, coordinators, and agency leadership
- Identify vendors with strong accessibility support
- Participate in IAAP work groups such as the certification committee



### **Strategy 3: Establish statewide standards and policies that support accessibility**

We currently have a single state accessibility standard, the direct outcome of legislation that required such a standard. It is comprised of a well-established national standard (Section 508 of the Rehabilitation Act of 1973) and guidelines (Web Content Accessibility Guidelines 2.0). The state standard works well to define the technical success criteria for accessibility. Understanding the standard requires extensive knowledge, training, and experience.

Internal partners have expressed a need for the Office of Accessibility to develop narrower, more specific standards to help guide decisions in procuring and creating digital technology and content. For example, application standards will define, within the landscape of an application type, which applications are acceptable for procurement. Technical standards will further define how to configure that application to conform to state requirements.

The Office of Accessibility will develop these standards with accessibility coordinators, accessibility communities of practice, and MNIT's Standards Committee.

#### **Standards: FY 19 actions**

- Update the exceptions appendix to the Minnesota Accessibility Standard in alignment with changes developed by MNIT and the Department of Administration
- Explore a single statewide accessibility policy

#### **Standards: Five year actions**

- Assess landscape and determine other standards as needed, possibly including:
  - Application standards
  - Document standards
- Create job classification(s) for MNT accessibility coordinators and require either part- or full-time coordinators based on agency size
- Explore policy for hiring vendors similar to disadvantaged/targeted with respect to accessibility practices
- Explore and implement outreach and communications such as code repositories and application-specific guidance



## CHAPTER 2: Proactive Risk Management

Some of the most important digital accessibility strategies are those preventing adverse accessibility events from happening. As awareness of the civil rights of people with disabilities increase, and as the state continues to hire more people with disabilities, the state’s risk profile grows. In state government, agency leaders have become more aware of the need to improve the accessibility of their infrastructure and services, but few know what to do. This plan will remedy that situation by providing state leaders with a much better understanding of accessibility risks and the appropriate countermeasures. The Office of Accessibility will introduce the concept of accessibility scorecards, which will give state leaders ongoing metrics to understand their risk posture. The Office also will engage state leaders in accessibility risk conversations during major system development projects.

Key to this strategy is helping agencies understand how to include accessibility requirements into their definitions of what digital technologies and services they need. MNIT builds and buys technologies for the agencies based on agency requirements, and while MNIT staff can advise, it is ultimately the agency’s responsibility to define their needs. While it is possible to add requirements retroactively, it is difficult and usually not as successful in the long run.

The concept of risk in this chapter is different from that used to label strategies as “high risk” and denoted with “⚠ [Risk].” The identified strategies require more resources than are currently available and therefore are at risk of being achievable. In contrast, the strategies in this chapter, in addition to being critical to fulfilling the mission of statewide accessibility, significantly reduce the state’s exposure to adverse events.



---

### Strategy 4: Build accessible applications and websites

Currently, there is no formal process to ensure that accessibility considerations are built into application development processes. One reason is limited resources. There are not enough people with the necessary knowledge and skills to even accomplish just the high risk projects. For the Office of Accessibility to effectively exercise its oversight role, it needs to either expand or have trained representatives distributed throughout the state. This strategy focuses on expanding the Office’s reach by ensuring the existence

of knowledgeable, trained personnel. When components of the strategy reference “accessibility,” personnel may be either employees of the Office or be trained designees such as accessibility coordinators (AC) or members of a specific community of practice (CoP).

This strategy leverages these people to ensure that every IT planning and development project includes at least one person familiar with accessibility requirements and practices. It also continues to grow and improve the tools available to the state for testing websites and applications. Such tools should evolve to include automatic safeguards and reminders to help ensure accessibility is included in the workflow of the development and testing lifecycle.

This strategy is consistent regardless of whether development and/or accessibility testing is performed by state staff or contractors. Large-scale and complex systems will likely require specialized contractors to perform accessibility testing and audits. State staff must be conversant with accessibility best practices to hire the right resources and perform appropriate supervisory and validation tasks.

This strategy focuses on building a culture of accessibility into all IT planning and development projects. Project managers and content managers will build accessibility practices into their operations, supported by tools and resources provided by the Office of Accessibility.

### **Applications & websites: FY 19 actions**

- Pilot statewide accessibility testing program

### **Applications & websites: Five-year actions**

-  [Risk] Integrate accessibility through appropriately trained personnel into all application development planning projects
-  [Risk] Implement website design and build review process that ensures accessibility
-  [Risk] Provide comprehensive statewide application and website testing toolbox
- Work with human resources and hiring managers to recruit employees with accessibility skills and experience
- Work with procurement officials to develop a master contract or process for hiring accessibility testing vendors

- Work with human resources and training managers to find/build and implement training and certification programs on developing accessible technology
- Develop statewide policies in partnership with agencies
- Establish recruiting and hiring practices that values accessibility experience and skills
- Provide mobile testing toolbox



## Strategy 5: Buy accessible systems and services

The state purchases about 70 percent of its applications (not including productivity tools). In addition, the state also relies heavily on vendors to build and/or integrate software, hardware, and complex digital systems for employee and citizen use.

As most digital technology markets are currently immature in their ability to support accessibility practices, such procurement routinely exposes the state to significant risk. Whenever the state enters into a contract to buy or integrate digital technology the state must be able to answer the following questions:

- How accessible and usable is the product as-is?
- How well has the vendor integrated accessibility into their own daily operations?
- What assurances can the state receive that maintenance and future upgrades<sup>8</sup> will continue to improve the product's accessibility?

Just as in the previous strategy, this strategy also strives to implement a culture of accessibility into the IT procurement and implementation processes. Accessibility and usability must be built into any purchase consideration, and state employees must be empowered through knowledge and skills to apply those features. Just as with the previous strategy, agencies define what they want to buy through technical requirements. Agencies need to develop a culture of incorporating accessibility into those requirements to ensure the greatest possible success.

This strategy requires close partnership with the Department of Administration as well as our agency partners. We have several evaluation tools on hand, which need to be updated then integrated into all relevant procurement processes.

---

<sup>8</sup> Upgrades are those changes that introduce significant change to the user interface.

The state currently has a Voluntary Product Accessibility Template® (VPAT) process, which requires vendors to detail how their products support accessibility. Its value is currently limited due to a variety of factors, including understanding of the form among both vendors and state RFP evaluators. The federal Section 508 standard, a key component of the Minnesota standard, was recently updated, and a new federal VPAT form has been created. We will review and modify that VPAT if needed for state use. Fully integrating the updated VPAT into state operations will take considerably greater time and resources, as it encompasses nearly every digital technology purchased by the state.

VPATs are specifically for existing products. In partnership with The National Association of State Chief Information Officers (NASCIO) and several other states, we developed the Policy-Driven Adoption for Accessibility (PDAA) tool, which also needs to be integrated into all IT procurement processes. (PDAA enables vendors to score the maturity of their internal support for accessibility across six criteria, such as having a policy, including accessibility in all phases of development, and ensuring relevant employees have relevant accessibility skills.) As noted, this will require intensive strategic and tactical engagement with the Department of Administration and other partners.

### **Buy accessible: FY 19 actions**

- Update the Voluntary Product Accessibility Template® (VPAT) documentation and process to reflect updated Minnesota Accessibility Standard
- Transition pilot of multi-phase evaluation process to formal process
- Implement application accessibility testing category in the MNIT professional services acquisition program

### **Buy accessible: Five-year actions**

- ⚠ [Risk] Develop statewide procurement policies and processes in partnership with agencies, particularly the Department of Administration.
  - Integrate Policy Driven Adoption for Accessibility (PDAA) into the procurement process
- ⚠ [Risk] Integrate accessibility through appropriately trained personnel into all applications planning and procurement processes, including major upgrades
- ⚠ [Risk] Implement vendor-based testing and reporting requirements in all contracts above a designated threshold

- Incorporate planned services scorecard (strategy 12) in MNIT service design and implementation
  - Monitor changes/improvements in customer experience
- Work with procurement officials to develop a master contract or process for hiring accessibility testing vendors (also in strategy 4)




---

## Strategy 6: Update existing systems for accessibility

What happens when the agency owns and operates technology that is not accessible, and cannot immediately be replaced by accessible technology? In order for technology to stay current with platform, network, and security requirements, it must update regularly. Those updates then place the technology within the scope of the state accessibility standard, even if it was procured prior to the standard.

Frequently such updates are performed by vendors. To that end:

- The capability to support accessibility must be a key component of vendor selection criteria
- Project managers must build accessibility into the update lifecycle, including requirements, design, development, and testing phases
- Project sponsors and champions need to recognize and support the value of including accessibility in the upgrade plan

This strategy is an outcome not only of upgrades in a technology's life cycle, but also when the situation arises from activities related to Strategy 9 (risk assessment) and all the strategies within Chapter 3 (internal capacity, including audits, testing, and related activities).

The Office of Accessibility and accessibility coordinators work with all parties to provide guidance, training, and feedback throughout the process.

### Update existing systems: FY 19 actions

- Continue providing guidance and feedback to MMB regarding updates of Oracle products whenever possible

### Update existing systems: Five-year actions

- Formally integrate Office of Accessibility into MNIT's Project Portfolio management process to ensure tracking of all systems updates
- △ [Risk] Integrate accessibility through appropriately trained personnel into all applications planning and upgrade processes
- Ensure that all project managers have training and knowledge to integrate accessibility into project planning processes
- Incorporate planned services scorecard (strategy 12) in MNIT service design and implementation
  - Monitor changes/improvements in customer experience
- Implement vendor-based testing and reporting requirements in all contracts above a designated threshold
- Secure agency leadership support for integrating accessibility into existing technology lifecycles

## Aa

### Strategy 7: Create accessible content

Content creation is highly decentralized at the state, understandable given that there are thousands of websites containing over two million pages of content in multiple formats within the mn.gov domain. This does not include the many more thousands of pages of internal content such as those stored on SharePoint sites and intranets as well as documents circulated via email.

All state employees who may touch any such content, from creation to review and publication, must have at least a working knowledge of accessibility and how to incorporate it into their work. Agencies and their departments need to build into their content creation and deployment workflows practices that ensure the final product is accessible. This requires partnering with agency training coordinators and Minnesota Management & Budget's (MMB) Enterprise Learning & Development (ELD) team.

### Content creation: FY 19 actions

- Launch accessible document creation training materials

### Content creation: Five-year actions

-  [Risk] Establish statewide online collaboration, training guidance, and management that enables use by all employees
- Integrate accessible content creation training into employee curriculum as appropriate
- Build and promote content creation workflow strategies and best practices




---

## Strategy 8: Conduct continuous risk assessments

Currently there is no comprehensive data defining the state's overall accessibility risk posture.

Risk assessments are both ongoing and as part of an audit. When procuring a product or service, if it is not accessible, the agency must file an exception document. This document notes how the product or service is not accessible, why it was procured, and any known plans for improvement.

Currently this is an ad hoc process with limited capacity for tracking and follow up. There are several issues that need to be addressed:

- Most agencies do not know how accessible their product or service are. So they do not know whether they are supposed to file an exception or what steps they may need to take to support the product or service
- There is no standardized agency-wide auditing process for accessibility (there have been several pilot audits using a tool called the Digital Accessibility Maturity Model)
- There is no single exceptions process, as both the Department of Administration and the Office of Accessibility reference separate exceptions processes, and the MNIT security team has their own exceptions process
- The current exceptions process as administered by the Office of Accessibility is paper-based, with no mechanism for tracking or follow up

Formalizing a more robust exception process and ongoing audit management will provide the state with a clearer picture of its accessibility risk posture and the capacity to develop and implement a plan to mitigate that risk. Ultimately these assessments should be incorporated into the services' scorecard as noted in strategy 12.

The exceptions process needs to be automated (that is, built into the development and procurement processes so as to be routine with scoring and tracking mechanisms) and integrated within all procurement and development life cycles to ensure effective tracking and follow up.

#### **Risk assessment: FY 19 actions**

- Design and initiate exceptions automation process in cooperation with MNIT's security team

#### **Risk assessment: Five-year actions**

- △ [Risk] Integrate the exception automation process into all digital procurement operations
- Implement within agencies a maturity model of risk assessment with annual reporting
- Training on standard methodology and templates for application risk assessments




---

### **Strategy 9: Communicate accessibility risks to agency leaders**

The Office of Accessibility strives to be transparent. We use the appropriate vehicle to share information with collaborators, partners, and stakeholders. Implementing the previous risk management strategies as well as other key strategies will generate considerable data and related information, which we will publish and distribute as appropriate.

Simply communicating risks, without resources to address those risks, is ineffective. Agency leaders need to know and have a trusted relationship with their accessibility resources. This ensures an effective pathway to communicate the relevant data so it doesn't get lost in the noise of daily operations, as well as a means to develop effective mitigation strategies. Accessibility coordinators play that role for their agencies, so a key element of this strategy is to elevate the visibility of coordinators at their agencies.

As noted in greater detail elsewhere, notably strategy 12, accessibility coordinators are embedded both at agencies and their MNIT partners. These coordinators, in addition to leading agency accessibility teams, work together both within and across agencies as resources for their agency and for the state.

### **Communicate: FY 19 actions**

- Chief Business Technology Officers (CBTOs) actively engaged in communicating accessibility issues/programs to agencies

### **Communicate: Five-year actions**

- Update communications plan to include specific, measurable outreach to agency leadership
- Develop sample position descriptions of non-MNIT accessibility coordinators and obtain active support from agencies (strategy 11 addresses MNIT coordinator position descriptions)
- Expand role of accessibility coordinators and accessibility teams at agencies
- Develop tools to aggregate and distribute relevant data




---

## **Strategy 10: Educate employees about the value of accessibility**

Accessibility is a statutory requirement, and is embedded in the state IT standards. Implementing it into state culture improves the state's effectiveness while reducing risk and long term costs. Culture change starts with education – getting state employees to understand how it is in their best interests to adopt accessibility practices and values. Many of the other strategies, particularly those in Chapters 1 (governance) and 2 (strategic partnerships), provide employees with the tools they need to make accessibility possible. For example, the accessibility teams as outlined in Strategy 1 should be implementing practices and workflows that employees can integrate into their work. This strategy focuses on increasing awareness of the business case for accessibility and the resources they have to make it happen.

A component of this strategy is helping employees learn how they can be part of the testing process for any digital content. Quality Assurance (QA) training should be embedded in everyone's work, whether an admin testing a Word document or a business analyst doing full-fledged QA testing.

Communication tools leverage internationally accepted concepts and practices to ensure that the state does not operate in a vacuum. In some cases, the state has become a leader in creating and publishing those tools, with other states and organizations referencing or downloading our materials. As the state becomes known as a leader in accessibility, state employees gain pride in their role of supporting accessibility. Enabling the public to access (when appropriate) the educational tools created for state employees will promote an increased awareness and understanding of accessibility throughout the state by citizens, as well as city and county governments.

This strategy continues current communications practices and expands the capacity of the Office of Accessibility to reach interested parties through the use of a supported newsletter application.

### **Educate: FY 19 actions**

- Create a short video introducing accessibility to state agencies
- Team with MNIT Communications staff in communications and related social media outreach
- Provide presentations and facilitate discussions at agencies
- Participate in outreach efforts by partners
- Distribute handouts on simple, easy-to-implement accessibility tips
- Host events/activities that tie in national initiatives such as National Disability Employment Awareness Month (October) and Global Accessibility Awareness Day (May)

### **Educate: Five-year actions**

- Maintain communications plan with accessibility coordinators
- Provide additional accessibility communications tools and resources to accessibility coordinators and other agency champions



## CHAPTER 3: Improve and Increase Internal Capacity for Accessibility

It is more productive and effective, when informing agencies of legal and fiscal obligations, to provide them with the capacity and tools to better support those obligations. To that end, the Office of Accessibility continually seeks ways to better empower and support MNIT and agency staff through tools, training, information, and other resources.



### Strategy 11: Enterprise resources for testing and remediation

The Office of Accessibility works closely with Accessibility Coordinators and other subject matter expert partners to identify the best testing tools and develop practices that effectively incorporate those tools. The goal is for testing and evaluation practices to be consistent across the state. To that end, we obtain statewide licenses for key tools. This reduces costs, streamlines administration, and ensures statewide efficient and effective access to those resources.

Automated tools are useful to establish benchmarks. Such tools routinely generate false positives and negatives. Manual testing and verification remains necessary to validate the data and determine necessary follow up. Simply procuring and deploying the tools isn't enough. Users must have good training on how to use the tools, read the data, communicate results, and then additional training on the manual processes.

Currently, acquisition, curation, and training is ad hoc, addressing several areas of need. Over the five-year cycle, the goal is to move from ad-hoc operation to a comprehensive suite that encompasses tools, best practices, training, and administration.

### Enterprise resources: FY 19 actions

- Maintain and update statewide accessibility-specific development and testing tools, including CommonLook, JAWS (screen reader software for blind and low-vision users), Siteimprove (managed by MNIT applications team) and others
- Update portable testing lab with improved promotion and distribution packaging
  - Hardware suite
  - Assistive technology suite
  - Available to agencies on request
  - User training/learning resources
- Formalize testing and vetting of testing tools list on website

### Enterprise resource: Five-year actions

- ⚠ [Risk] Provide comprehensive applications and website testing suite, with training and guidance
- Build internal training/refresher resources for key tools such as CommonLook
- Supplement portable testing lab with hardware and software for mobile apps and sites
- Expand standards library to include applications and documents as warranted




---

## Strategy 12: Improve our understanding of the IT environment

We are in transition from reactive to proactive. While we have a good idea of which state systems pose the greatest accessibility risks, if we were to review a catalog of the state's 4,126 IT products and services (as of Fall 2017), we would not be able to identify the level of risk each product or service represents. Strategy 8 (“Conduct continuous risk assessments”) starts us on this path, but only focuses on new products and services. We also need to implement mechanisms that provide us and our partners with a comprehensive view of the state's current accessibility posture. This strategy seeks to put those mechanisms in place.

Accessibility coordinators play a critical role in nearly all aspects of the strategic plan. The Office of Accessibility augments its small staff through the network of Coordinators embedded throughout MNIT and partner agencies. While individual coordinators have widely varying roles within agencies all share a responsibility to implement accessibility practices at their agencies. Currently, the coordinator role has grown organically, with few agencies allocating specific hours to the role or establishing a specific position description for that role. This strategy seeks to formalize the roles of Accessibility Coordinator in both MNIT and agency partners. In addition to raising the profile of the coordinators, this will also enable the coordinators to formally lead accessibility projects as outlined in this and other strategies. Equally important is the need to clarify and balance the roles of MNIT and partner agencies when defining business requirements and the means to satisfy them.

In addition to coordinators, this strategy ties in with other strategies to ensure that accessibility must always be accounted for at every stage of the design, development, and procurement cycles.

#### Understanding of IT environment: FY 19 actions

- ⚠ [Risk] Engage with MNIT leadership for inclusion in services planning
- Develop and implement in partnership with MNIT and the Department of Administration a standardized well-defined role for accessibility coordinators and the Office of Accessibility in RFP creation and vendor reviews
- Update the exceptions process in alignment with updated state standard

#### Understanding of IT environment: Five-year actions

- ⚠ [Risk] Automate the exceptions process in alignment with updated state standard (see Strategy 8)
  - Combines risk assessment with categorization of all systems as low, medium, high risk
- ⚠ [Risk] Categorize all ultra-high-risk systems into “sunset” and plan for replacement
- Collaborate with state IT architect to review statewide IT audit and develop short, medium, and long-range plans
  - Leverage statewide application inventory with relevant technology details
- Evaluate MNIT coordinator roles and responsibilities
  - Develop position descriptions (in alignment with agency coordinator descriptions)
  - Integrate with agency accessibility teams
  - Lead training programs to get coordinators certified as accessibility professionals
- Design and implement a scorecard tool for evaluating a product or service’s risk level



---

## **Strategy 13: Well-defined protocols for integrating accessibility checks throughout document, web, and app development and user acceptance processes**

The Office of Accessibility currently develops processes in concert with Accessibility Coordinators and subject matter experts, incorporating international best practices. Once a process is developed and thoroughly tested, it is published on at least one of two levels. All information is published on a statewide resource site visible only to state employees. These materials become key resources for other strategies. In addition, some of the resources, as appropriate, are published on the public website for both internal and external distribution. Both distribution mechanisms provide a valuable feedback loop as we continue to refine and improve the protocols.

This strategy identifies key areas of need for best practices and works with subject matter experts to develop those practices and guidance.

### **Accessibility checks protocols: FY 19 actions**

- Leverage document training programs to publish and promote document development guidelines
- Publish document development workflow guidelines
- Initiate testing and evaluation protocols development project

### **Accessibility checks protocols: Five-year actions**

- Sponsor and nurture communities of practice with state subject matter experts (see Chapter 1: Partner for Success) in their subject areas and produce guidance relative to those subject areas.
- Create additional communities of practice as needed, including, but not limited to: web and application development, optical character recognition (OCR), and multifunction devices.



## Strategy 14: Training curriculum for every major subject area

The Office of Accessibility constantly surveys the training landscape for resources. We subscribe to several organizations that provide webinars and related information. Whenever a good program is announced, we alert Accessibility Coordinators and, when relevant, members of a community of practice or state employees that follow our communication channels. Many of these programs are free, while others are available at a low cost via statewide subscription. In addition, the Office works with Coordinators to design and provide training through local events such as the annual GTS IT Symposium and MNIT Week as well as national channels such as the Great Lakes ADA Center.

This ad hoc training has worked to elevate the knowledge and skill levels of some state employees. But it lacks the reliability of a curriculum in which specific trainings are paired with appropriate knowledge areas.

In addition, it can be a challenge to find training that fits our standards. To that end, we have developed some training internally. The goal is to combine self-created trainings with carefully selected external resources to build a curated curriculum over time.

For this strategy to be successful, it needs to operate in partnership with HR directors and training directors and coordinators.

### Training: FY 19 actions

- Promote free and low-cost programs as available
- Launch Word eLearning in the statewide learning management system
- Develop and launch hybrid Word program (eLearning and classroom instruction)
- Launch 4-part basic accessible PDF series
- Launch 4-part accessible InDesign series
- Expand accessibility training for project managers

### Training: Five-year actions

- In coordination with MNIT training coordinator, develop full curriculum for training and relevant certification, particularly via International Association of Accessibility Professional (IAAP)

- Partner with MNIT HR and agency HR directors to gain support for the training initiatives
- Build accessibility awareness and training into all agency onboarding and new employee training programs
- Use existing training when possible
- Build/source training to address gaps
- Integrate core units into statewide onboarding and employee training plans




---

## **Strategy 15: Develop and maintain statewide accessibility knowledge center**

The term “knowledge center” references the combined resources of the public website, MNIT intranet, statewide SharePoint site, news bulletins (via GovDelivery), Yammer, and related materials. In addition to training, the knowledge center will contain procedures, best practices, and other leading-edge resources and information on accessibility.

Content will be located based on its type and maturity level. The Office and its internal partners will develop some of the content while others will contain or point to other that created by other authoritative sources.

### **Knowledge center: FY 19 actions**

- Update public site through website reorganization and content strategy

### **Knowledge center: Five year actions**

Develop comprehensive content strategy that integrates all relevant knowledge media based on maturity level

- High-maturity information on public website, except for sensitive or confidential material
- Sensitive high-maturity information on MNIT intranet or SharePoint (or equivalent)
- Low-and medium-maturity information on SharePoint (or equivalent)

# Citations

- 1 Accessibility, as noted by the World Wide Web Consortium (W3C), ensures "equal access and equal opportunity to people with diverse abilities." The International Standards Organization (ISO) defines usability as the "extent to which a product can be used by specified users to achieve specified goals effectively, efficiently and with satisfaction in a specified context of use." It is possible to create complex, unusable but accessible technology, just as it is possible to build simple, well-designed products that leave out key accessibility functions. Office of Accessibility vision statement return link
- 2 [MMB's Executive Order 14-14 dashboard \(https://mn.gov/mmb/employee-relations/equal-opportunity/eo-14-14/\)](https://mn.gov/mmb/employee-relations/equal-opportunity/eo-14-14/), 3rd Qtr FY 2018 Statewide Totals.
- 3 [Seyfarth Shaw's annual ADA lawsuit tracking](#)
- 4 [SSA Disability Facts https://www.ssa.gov/disabilityfacts/facts.html](https://www.ssa.gov/disabilityfacts/facts.html)
- 5 [MN State Demographic Center calculations and projections. https://mn.gov/admin/demography/data-by-topic/labor-force/](https://mn.gov/admin/demography/data-by-topic/labor-force/)
- 6 [2017 Disabilities Statistics Annual Report. https://disabilitycompendium.org/](https://disabilitycompendium.org/)
- 7 [MDHR Legislative Report https://mn.gov/mdhr/assets/mdhr\\_legislative\\_report\\_july2016\\_tcm1061-263683.pdf](https://mn.gov/mdhr/assets/mdhr_legislative_report_july2016_tcm1061-263683.pdf)
- 8 Upgrades are those changes that introduce significant change to the user interface.