Accessibility Implementation Communication Plan

Agency of All Good Things

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Background

In 2009, the Minnesota legislature passed, and the governor signed into law a statute and funding to advance the accessibility of State of Minnesota information technology systems used by both citizens and employees (https://www.revisor.mn.gov/statutes/?id=3.302).

The aim of IT accessibility legislation is that:

- All citizens shall be able to access state government electronic information and services.
- All state employees shall be able to access electronic information, products, and applications to do their jobs.

The law provided funding and direction to the Office of Enterprise Technology and the Department of Administration to establish specific IT Accessibility policy and standards for the State of Minnesota. The MN State IT accessibility standards became effective in September of 2010.

During the two year effort Accessibility Standards were adopted into Enterprise Architecture, and the standards in turn were incorporated into IT procurement documents and processes, and standards based IT purchasing.

Individual state agencies are now responsible to ensure that all web sites, software applications, electronic documents, video and multimedia they buy or develop are accessible.

This plan addresses all aspects of communication related to implementing accessible technology at the Agency of All Good Things.

Situation

The evolving state of information technology is reflected in the way Minnesota state government serves the public. Taking advantage of continuously changing technology, state government is increasing its use of technology to offer citizens a host of electronic services. These services may include corresponding online with elected officials, providing information about government services, renewing licenses, providing tax information and filing returns, and applying for jobs or benefits.

Likewise, state government employees increasingly depend on information technology to support state government services. Employees use technology to communicate through email, manage documents and schedules. Software applications may be used by all employees, (the HR/Payroll system), a significant number of employees (the procurement/accounting application) or may be agency or role specific (a case management application). The use of information technology doesn't end with software applications. Printers, copiers, LCD projectors, training webinars, and even voice over internet protocol (VoIP) telephones are widely used and connected to the information technology infrastructure.

As government is constantly being asked to be more efficient, information technology is playing a vital role in allowing government to better serve all of its citizens. Ensuring that state government systems are both accessible, and easy to understand and use, is critical to ensuring state government technology and services are accessible to all citizens and employees.

As baby boomers age, disability statistics are expected to rise. Aging and disability statistics highlight the demand for accessible design. According to the MN State Demographic Center projections, "By 2015 there will be almost 800,000 elderly Minnesotans, and by 2025 more than 1 million." http://www.demography.state.mn.us/PopNotes/ElderlyMinnesotans2004.pdf

Data from the Survey of Income and Program Participation (SIPP) of the United States Census Bureau state that "there are approximately 54 million Americans with disabilities." http://www.ilr.cornell.edu/edi/disabilitystatistics/faq.cfm#Q9 The Rural Institute at the University of Montana provides the following sample of citizens with disabilities in MN counties:

- 147,296 citizens in Hennepin County
- 74, 372 citizens in Ramsey County
- 41,528 citizens in Dakota County
- 33,458 citizens in St. Louis County (http://rtc.ruralinstitute.umt.edu/geography/default.htm)

If Minnesota state government is to continue its efforts to deliver an increasing number of state services through the internet, it cannot ignore that a growing number of citizens will not be able to access services they need if our technology is not accessible.

In accordance with State of Minnesota law and the Enterprise Architecture Accessibility Standard, the Agency of All Good Things intends to develop and implement a foundation of policies, standards, processes, and tools to proactively improve the accessibility of Minnesota state government's technology when building and/or buying information systems.

Challenges

The purpose of creating and implementing an Technology Accessibility Plan for the Agency of All Good Things is to establish an infrastructure of policies, processes, roles, communication, and tools that will become a foundation to ensure greater technical accessibility moving forward.

Accessibility is a journey not a destination. Creating accessible technology is an ongoing effort that requires culture change. Culture change begins with awareness, then a clear understanding of why accessibility is important, and finally, training that supports the change.

In an environment of shrinking resources and budgets, stakeholders may question the value of spending a disproportionate amount of the State's budget on a small constituency. This communication challenge can be addressed in a multiple ways:

- Change the collective understanding from accommodation (as we knew it in the American Disabilities Act) to accessibility – the two are not the same thing.
 Accommodation is focused on an individual; accessibility is focused on the technology.
- Demonstrating that accessibility does not necessarily increase the costs of procurement or development when it is built in from the beginning
- Highlighting changing demographics (aging baby boomers) and that disabilities increase with the age
- Emphasizing the collateral benefits that can be derived by incorporating accessibility into our information technology

Stakeholder/Audience Analysis

There are five main categories of audiences for the Technology Accessibility Implementation and Standards project communications: decision makers, advocates/partners, technology accessibility implementers (information technology and procurement personnel), state government technology users, and vendors.

Decision makers

Agency Commissioners, CIO, CFO

The Commissioner is ultimately accountable for the success of the Agency of All Good Things Accessibility Implementation Plan. The Commissioner is not involved in the daily activities involved in implementing accessible technology; this responsibility has been delegated to the Agency CIO and CFO.

The Commissioner needs to understand why accessibility is important, what could happen if accessibility efforts were to be delayed; and context: what alternatives were considered, and how this agency's effort differs from approaches taken by other agencies. And finally the Commissioner needs to be familiar with the agency accessibility implementation plan, why decisions were made, and the impacts of either implementing or deviating from the plan.

The Agency CIO and CFO are accountable for the successful implementation of Accessibility Standards. The CFO is accountable for processes that result in IT procurement of the most accessible technology. The CIO is accountable for processes, tools, and resources that result in accessible application and web development activities

The Commissioners, CIO, and CFO are champions for the accessibility effort and are critical to a successful implementation.

Decision makers must be kept informed of all aspects of accessibility planning, implementation, and progress. They provide input and review for the accessibility implementation plan and have a working knowledge of all plan objectives and deliverables.

Advocates/partners

Office of Enterprise Technology/Enterprise Architecture Office, Department of Administration/Materials Management Division

As a result of the 2009 Technology Accessibility legislation, the Office of Enterprise Technology and the Department of Administration conducted a project to adopt Accessibility Standards and implement those standards. During this project these departments made an effort to centralize as much of the accessibility work as possible. Summarizing the result of the project follow:

- Standards adopted in the Enterprise Technology Architecture (OET/EAO)
- Procurement tools and processes for all IT purchases were modified (Admin/MMD)
- Standards based purchasing for IT products and services were modified to include the Accessibility Standards (OET/ISRM)

These work groups can provide expertise and guidance to the Agency of All Good Things during the development of the Accessibility Implementation Plan and implementation of that plan.

Additionally, the Enterprise Architecture Office should be included in the final review of the Accessibility Implementation Plan.

Accessibility Implementers

Application developers, web developers, business analysts, project managers, procurement staff, IT product/service managers, content creators, trainers, communication officers

This audience includes stakeholders who will be expected to implement the standards and processes in their daily jobs. This group needs to understand why technology accessibility is important to state government. As a group, they have many competing priorities and may see technology accessibility as a solution for a small constituency. The Accessibility Standards are focused on acquiring or developing technology and not retrofitting existing technology. This is a key message for this group. Demonstrating that many of the standards are really best practices for application and web development that ensure systems are not only accessible but more usable as well, should be included in communication. And last, it is important that they understand the distinction between accessibility and accommodation. Whenever possible these key messages should be delivered by their counterparts.

State government technology users

State government employees, citizens, local government employees

As end users of state government information systems, this group represents the ultimate customer accessibility efforts. Communication to this group of stakeholders should focus on outcomes and benefits to all users as a result of improving technology accessibility. The communication plan will identify opportunities to inform this group of stakeholders about the commitment of the Agency of All Good Things to technology accessibility and any results of implementation efforts that will impact enduser groups. These opportunities may include internal training, newsletters, brown bag presentations, external media, or any other communication vehicle that can be used to socialize this effort to this widespread audience.

Vendors

Hardware and software suppliers; professional and technical contractors

In general, hardware and software suppliers will need to understand changes to the contract process, including, how to respond to a request for a VPAT (Voluntary Product Accessibility Template). This may not be an issue to many vendors because of similar requirements from the federal and other state governments. The Materials Management Division can assist your procurement team and vendors in understanding the impact of Accessibility on the procurement process.

Professional and technical contracts will also be impacted, as contractors working with state government applications and web-sites will need to demonstrate their experience and understanding of the adopted accessibility standards. Contract language has been modified to include this expectation as well as a way to measure contract performance.

Key Messages

Key messages for the Technology Accessibility implementation are intended to inform and persuade accessibility stakeholders.

1. Effective use of technology solves problems that without technology were much more difficult or impossible to solve

At first glance it might seem unfair that a service delivered with technology is held to a higher standard than a manual process. The question really isn't, "Why are we expected to have accessibility features that weren't available in the previous delivery method?" Instead we should be asking, "When new technology is implemented, how can we improve accessibility for users who have previously been unable to access this service?" The new mantra is: *Technology is the solution not the barrier*.

2. Accessibility is not the same thing as accommodation Technology accessibility is an "electronic curb cut"

When most of us, are first exposed to the concept of Technology Accessibility we typically think of the American Disabilities Act (ADA) and the term "reasonable accommodation". An example of an accommodation is changing a cubicle setup to accommodate an employee in a wheelchair. An accommodation is focused on an individual. Accessibility, on the other hand is focused on the technology. Everyone, regardless of their disability status uses the same technology (hardware or software) and has access to the same information.

A great example, of accessibility is a curb cut, the way sidewalk street corners are engineered to create a smooth transition between the sidewalk and the street. Although, curb cuts were originally installed as accommodations for accessible hardware (wheel chairs, walkers, etc) they are actually useful to everyone (joggers, bicyclists, parents with strollers, and delivery people with dollies). What was once considered an accommodation is now viewed as a standard feature of the modern sidewalk.

Technology accessibility can be thought of as an electronic curb cut. That is, we use purchasing and design standards that ensure the technology solutions delivered are accessible to everyone – one solution fits all. In other words, we don't purchase a special laptop to work with reader technology; every laptop ordered is capable of doing that. We don't put a notice on our video files, "if you are unable to hear the audio component, download a copy of the transcript"; instead we caption the video.

Just like a sidewalk curb cut, the electronic curb cut brings benefits beyond better integration with accessible hardware and software. A few examples include:

- Captioned videos can be viewed by individuals without speakers or in a cubicle when others would be bothered by sound.
- Navigation that doesn't require a mouse, is appreciated by many laptop users
- Alt text and captions improve metadata
- Using CSS separates form from content which makes it easier to display web content in different formats, for example, cell phones

Accommodation is used when an accessibility solution is determined to be not feasible.

3. Technology Accessibility is not necessarily more expensive, if it is planned from the beginning

By building accessibility into the requirements of information technology hardware and software, the cost of accessibility is often negligible. Retrofitting those technologies once they are in place can be cost prohibitive. The Technology Accessibility Standards Implementation project will create and implement standards and processes that include upfront assessment of accessibility requirements. Those requirements will be embedded in state government contracts and purchasing standards, enterprise architecture, and software/web development processes.

4. Technology Accessibility is an important component of delivering State services electronically

Inaccessible technology potentially interferes with an individual's ability to obtain and use information quickly and easily. The Minnesota legislation in 2009 intends to eliminate barriers in information technology, to make available new opportunities for people with disabilities, to make available state government services delivered or accessed through information technology, to make and to encourage development of technologies that will help achieve these goals. When our state information technology systems are inaccessible we unfairly exclude a portion of those end users who need to access our information or services.

5. The Agency of All Good Things Accessibility Implementation Plan creates a bridge that connects the Accessibility Standards to the people, processes, and tools that deliver information technology

The proponents for technology accessibility work toward the day when all state government systems are accessible, providing equal access to information and services. Those who will ultimately implement Minnesota state government technology accessibility standards may agree with that vision, but worry about the cost, effort, and overall effect on technology delivery if they were to fully comply with technology accessibility standards.

The purpose of creating an Accessibility Implementation Plan for the Agency of All Good Things is to implement the Accessibility Standards adopted by the Office of Enterprise Technology by putting in place processes, tools, and support (e.g., guidelines and training) that make accessibility simply the way we do business.

6. If you can't make it accessible, then what's your plan for accommodation?

Beyond litigation, stemming from unequal access to information and services, state government agencies must also recognize that procuring or developing inaccessible systems means that accommodations must be available to those who cannot access this information. From a process point of view, exceptions are always more costly than following a standard path. Exceptions in this case mean that information may have to be maintained in multiple places and formats; or it may mean that a brick and mortar office can't be closed because an online service cannot be accessed by all those that need it.

7. The need for accessible technology is growing rapidly

Attention to technology accessibility becomes increasingly important as the population ages. Disability statistics rise significantly by age group (7% of the population at 18-24 years, 37% of the population at 65-74 years, and 59% of the population at 75+ years). And as people age, they will likely require more state government services and will look online to find them.

8. Technology Accessibility is a journey not a destination

We must be clear, 100% accessible is a goal that is never fully realized. In fact, as technology evolves, standards and their implementation must also evolve. The purpose of creating and implementing an agency accessibility plan is to identify and put in place the processes, tools, and training that enables state employees to procure or develop IT systems and content that best meet accessibility standards. This is long term process and commitment to ensure technology accessibility is built into the ways we acquire IT, so that as systems are replaced every attempt will be made to replace them with systems where accessibility was one of the basic requirements.

Resources

Identifying and developing resources are important communication tasks; just as important is matching each audience to its most effective resource. The following list is incomplete, and will be added to as opportunities arise and vehicles and tools are developed.

Opportunities

Agency or organizational management meetings; division meetings; communication events such as brown bags; internal communication via newsletters or intranet; agency annual reports

Messengers

Commissioner, CIO, CFO, Implementation Planning Team; Communications

Vehicles

Personal visits; Group presentations; Focus Groups with key stakeholders; Letters; Emailed updates; Status Reports; Newsletter articles; Agency of All Good Things web site and intranet site; Communication Toolbox (White papers; FAQs; PowerPoint presentations; implementation progress, summary documents); Agency metrics and annual reports

Important Note

It is extremely important that all communication vehicles used in this effort provide information accessibly. Websites need to meet Section 508 and WCAG 2.0 guidelines. Meetings and presentations need to have Braille copies of meeting materials, interpreters or CART services as needed by attendees. Word documents, PDF's and other files distributed to project members or more general audiences need to adhere to accessibility standards. And when an accessible solution is not available, alternate formats or other accommodations must be made.

Information by Stakeholder Group

| Stakeholders | Type of Information and Key Messages | Delivery Method | Frequency | Messenger |
|--------------|--|--|---|---|
| Commissioner | Implementation Plan Objectives and Scope; Risk and Issues; Status of Implementation Progress; Familiar with all key messages | Update Meeting with CIO and CFO; Email and Phone | Monthly Other updates as needed – based on issues | CIO and CFO |
| CIO's | Legislation, Standards, High Level Objectives and Impact, and Benefits Implementation Plan and Metrics Key Messages #1,2,3,5,6,8 | OET and Admin Newsletters, presentations, websites Progress updates from technical divisions | Ongoing | OET Enterprise Architecture Office Communication, |
| Agency CFO's | Legislation, High Level Objectives and Impact, and Benefits Implementation Plan and Metrics Key Messages #2,3,5,8 | OET and Admin Newsletters, presentations, Communication from CIO Office and MMD, websites Summary of IT procurement activities and accessibility | Ongoing | OET and Admin Communication |

| | | results | | |
|---|--|--|-----------|--|
| Stakeholders | Type of Information and Key Messages | Delivery Method | Frequency | Messenger |
| Agency Leadership | Legislation, High Level Objectives and Impact, and Benefits Key Messages #1,2,3,4,5,6,7,8 | Internal Newsletters, Updates at leadership meetings, presentations, Communication from CIO Office | Ongoing | Communication Division, CIO and CFO |
| Technologists - application and web developers, business analysts, project managers, | Why, what, and how. Understand specifics of adopted standards and how to apply. Key Messages #1,2,3,4,5,8 | Brown bags/group presentations, schedule training events, newsletters, | Ongoing | CIO, Technical managers, Application Development and Architecture staff, OET Architecture Office |
| Procurement staff – specifically buyers and contract specialists | Why, what and how. Understand changes to procurement processes and how to apply to ensure accessible purchases of IT. Key Messages #2,3,5,6,8 | Brown bags/group presentations, newsletters, (Specific groups - e.g., Agency Procurement Coordinators) | Ongoing | MMD trainers, ISRM |

| Stakeholders | Type of Information and Key Messages | Delivery Method | Frequency | Messenger |
|-------------------|--------------------------------------|--------------------------|-----------|----------------|
| End Users – | Legislation, | Brown | Ongoing | Commissioner, |
| Agency of All | purpose, impact | bags/group | | CIO, CFO, |
| Good Things | who to contact | presentations, | | Communications |
| employees | with questions | conferences, | | Office |
| | Key Messages | internal newsletters, | | |
| | #2,5,8 | FAQ's | | |
| End Users – Local | Key Messages | External | Ongoing | Commissioner, |
| Government | #2,5,8 | newsletters, web | | Communications |
| employees | | site | | Office |
| End Users – | Commitment by | Information on | Ongoing | Communication |
| Citizens | Agency to | websites, FAQ's | | Team |
| | improve | | | |
| | accessibility | | | |
| Vendors | Legislation, final | Information | Ongoing | Procurement |
| | procurement | provided during | | staff |
| | deliverables and | the solicitation | | |
| | processes | process | | |
| | | | | |