

<h2>State of Ohio IT Policy</h2> <p>Web Site Accessibility</p>	No: ITP- F.3
	Effective: 08/20/2007
	Issued By: R. Steve Edmonson Director, Office of Information Technology Published By: Statewide IT Policy Investment and Governance Division

1.0 Purpose

This state policy establishes minimum Web site accessibility requirements for information and services provided on **state-controlled Web sites**.

2.0 Scope

Pursuant to Ohio IT Policy ITP-A.1, “Authority of the State Chief Information Officer to Establish Policy Regarding the Acquisition and Use of Computer and Telecommunications Products and Services,” this state policy is applicable to every organized body, office, or agency established by the laws of the state for the exercise of any function of state government except for those specifically exempted.

The scope of this information technology policy includes state computer and telecommunications systems and the employees, contractors, temporary personnel and other agents of the state who administer such systems.

3.0 Background

Government must strive to make information and services accessible to all. The State of Ohio increasingly serves its citizens, businesses, and visitors through the Internet. As part of an ongoing effort to make the state’s online services available to all Ohioans, agencies must take reasonable steps to ensure that state-controlled Web sites do not present unnecessary barriers to those with disabilities. The importance of accessible Web sites will continue to increase as the number of services the state delivers on state-controlled Web sites expands.

According to the 2005 American Community Survey, 16.6 percent of Ohioans over the age of five have disabilities.¹ Many rely on assistive technologies to render Web pages more usable. In an effort to address accessibility issues, nationally recognized standards

¹ The Center for Personal Assistance Services. American Community Survey: 2005.
http://www.pascenter.org/state_based_stats/state_statistics_2005.php?state=ohio.

have been established by independent organizations to improve the experience of using Web sites for persons with visual, physical, or developmental disabilities.

The federal government has created its own standard for Web accessibility. **Section 508 of the Rehabilitation Act** states that federal government agencies shall create accessible Web sites for federal government employees and the general public. Section 1194.22 of the Code of Federal Regulations outlines the specific standards that must be followed to create accessible federal government Web sites. Federal agencies must adhere to section 1194.22 standards to ensure compliance with section 508 of the Rehabilitation Act. Although section 508 and section 1194.22 apply to federal government agencies, many states have chosen to adopt the standards relating to Web-based intranet and Internet information and applications.

4.0 References

- 4.1 Ohio IT Policy ITP-A.1, "Authority of the State Chief Information Officer to Establish Policy Regarding the Acquisition and Use of Computer and Telecommunications Products and Services," defines the authority of the state CIO to establish State of Ohio IT policies as they relate to state agencies' acquisition and use of information technology, including, but not limited to, hardware, software, technology services and security.
- 4.2 Section 508 of the Rehabilitation Act (29 USC 794d, 1998) states that federal government Web sites shall be accessible to federal government employees and citizens who desire to seek information from federal agencies.
- 4.3 Section 1194.22 of the Code of Federal Regulations (36 CFR 1194.22, 2000) outlines the requirements that federal government Web sites must follow to provide accessibility as outlined in section 508 of the Rehabilitation Act.
- 4.4 A glossary of terms found in this policy is located in section 9.0 - Definitions. The first occurrence of a defined term is in ***bold italics***.

5.0 Policy

State agencies shall establish a Web site accessibility strategy that applies to the design, development, implementation and maintenance of agency Web pages. At a minimum, state-controlled Web sites shall meet the following requirements:

- 5.1 Web Page Accessibility Requirements. State-controlled Web pages shall be compliant with the accessibility standards established by section 508 of the Rehabilitation Act and detailed in section 1194.22 of the Code of Federal Regulations, "Web-based intranet and internet information and applications" (see *Attachment 1*).
- 5.2 Outsourced Web Development. Agencies shall ensure that all contracted, in-kind, or other third-party Web site development complies with the accessibility standards established by section 508 of the Rehabilitation Act and detailed in

section 1194.22 of the Code of Federal Regulations, “Web-based intranet and internet information and applications” (see *Attachment 1*).

5.3 Accessibility Statements. Agencies shall include an accessibility statement at a minimum on the **agency home page** and primary entry points or provide a link to an accessibility statement. The accessibility statement shall describe:

- A statement of compliance if compliance has been attained;
- A statement describing steps taken to ensure continuing compliance if compliance has been attained; and
- A feedback mechanism for Internet visitors to report accessibility issues with the agency’s Web site.

6.0 Procedures

None.

7.0 Implementation

This state policy requires that state agencies ensure a certain level of accessibility on state-controlled Web sites, and that certain related management controls must be in place.

As of the effective date of this state policy, some agency Web sites are unlikely to be completely aligned to the requirements of this policy. Given the varying degrees of complexity and capability of each agency’s environment, alignment to certain requirements may require a development period.

Given these understandings, a general implementation framework for the requirements of this policy includes:

7.1 Web pages created after the effective date of this policy shall be compliant.

7.2 If there is reasonable opportunity, Web pages created but not yet implemented as of the effective date of this policy shall be compliant.

7.3 Web pages that are redesigned after the effective date of this policy shall be compliant.

7.4 Web pages already in place shall be made compliant, if not already, within a reasonable amount of time in consideration of the complexity and capability of the agency’s environment with priority given to the agency home page and Web pages that receive frequent traffic.

7.5 A process of incremental efforts toward implementation of the management controls contemplated by this policy shall begin.

- 7.6 All state-controlled, public-facing Web pages shall be compliant with this policy within two years of the effective date.

8.0 Revision History

Date	Description of Change
08/20/2007	Original policy.
08/20/2009	Scheduled policy review.

9.0 Definitions

- 9.1 Agency Home Page. The agency home page serves as the starting point to navigation for an agency site or agency presence. It is the first page presented when an Internet user navigates to an agency site or an agency presence on the World Wide Web.
- 9.2 Section 508 of the Rehabilitation Act. Section 508 of the Rehabilitation Act requires any electronic information that is developed, procured, maintained or used by the federal government to be accessible to persons with disabilities. Accessibility statements often use the phrase “Section 508” to refer to the federal Web site standards for accessibility, which can be found in section 1194.22 of the Code of Federal Regulations (36 CFR 1194.22, 2000).
- 9.3 State-controlled Web sites. Web sites developed and maintained by Ohio agencies, or under contracts administered by Ohio agencies.

10.0 Related Resources

The following resources provide accessibility standards, guidelines, training opportunities and tools to assist Web page authors and designers:

Section 508 Web Accessibility Guidelines
Code of Federal Regulations (36 CFR 1194.22, 2000) http://frwebgate.access.gpo.gov/cgi-bin/get-cfr.cgi?YEAR=current&TITLE=36&PART=1194&SECTION=22&SUBPART=&TYPE=TEXT
Training and Educational Resources
Web-based Intranet and Internet Information and Applications (1194.22) Guide http://www.access-board.gov/sec508/guide/1194.22.htm
Section 508 Training http://www.section508.gov/index.cfm?FuseAction=Content&ID=5
Information Technology Technical Assistance and Training Center http://www.ittatc.org/training/web_training.php
Web Content Managers Advisory Council's Web Manager University Training Program http://www.usa.gov/webcontent/resources/training/university.shtml
U.S. Department of Education - Testing for Web Accessibility Compliance Under Section

508 of the Rehabilitation Act of 1973 http://www.ed.gov/policy/gen/guid/assstesting.html
PDF and Microsoft Office Accessibility Guides
Adobe Accessibility Resource Center http://www.adobe.com/accessibility/index.html
General Services Administration Guide to Creating Accessible PDF Documents http://www.section508.gov/docs/PDFGuidanceForGovernment.pdf
Accessibility Tutorials for Microsoft Products http://www.microsoft.com/enable/training/default.aspx
Web Site Tools
World Wide Web Consortium (W3C) Advanced Search for Web Accessibility Evaluation Tools http://www.w3.org/WAI/ER/tools/advanced
Section 508 Links to Accessibility Tools and Resources http://www.section508.gov/index.cfm?FuseAction=Content&ID=83
Adobe PDF Converter http://www.adobe.com/products/acrobat/access_onlinetools.html

11.0 Inquiries

Direct inquiries about this policy to:

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Ohio IT Policy may be found on the Internet at: www.ohio.gov/itp

12.0 Attachments

- 12.1 Attachment 1 – Section 1194.22 of the Code of Federal Regulations (36 CFR 1194.22, 2000). This attachment contains the accessibility standards required by section 508 of the Rehabilitation Act.

Attachment 1

Section 1194.22 of the Code of Federal Regulations (36 CFR 1994.22, 2000), as required by Section 508 of the Rehabilitation Act²

§ 1194.22 Web-based intranet and internet information and applications.

- (a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).
- (b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.
- (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.
- (d) Documents shall be organized so they are readable without requiring an associated style sheet.
- (e) Redundant text links shall be provided for each active region of a server-side image map.
- (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.
- (g) Row and column headers shall be identified for data tables.
- (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.
- (i) Frames shall be titled with text that facilitates frame identification and navigation.
- (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.
- (k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.
- (l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by assistive technology.

² <<http://frwebgate.access.gpo.gov/cgi-bin/get-cfr.cgi?YEAR=current&TITLE=36&PART=1194&SECTION=22&SUBPART=&TYPE=TEXT>>

(m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).

(n) When electronic forms are designed to be completed on-line, the form shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.

(o) A method shall be provided that permits users to skip repetitive navigation links.

(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.

Note to §1194.22:

1. The Board interprets paragraphs (a) through (k) of this section as consistent with the following priority 1 Checkpoints of the Web Content Accessibility Guidelines 1.0 (WCAG 1.0) (May 5, 1999) published by the Web Accessibility Initiative of the World Wide Web Consortium:

Section 1194.22 Paragraph	WCAG 1.0 Checkpoint
(a)	1.1
(b)	1.4
(c)	2.1
(d)	6.1
(e)	1.2
(f)	9.1
(g)	5.1
(h)	5.2
(i)	12.1
(j)	7.1
(k)	11.4

2. Paragraphs (l), (m), (n), (o), and (p) of this section are different from WCAG 1.0. Web pages that conform to WCAG 1.0, level A (i.e., all priority 1 checkpoints) must also meet paragraphs (l), (m), (n), (o), and (p) of this section to comply with this section. WCAG 1.0 is available at <http://www.w3.org/TR/1999/WAI-WEBCONTENT-19990505>.