Digital Accessibility and Inclusion Standard

Committee on Information Technology (COIT)

The City and County of San Francisco (City) deploys websites and digital tools to empower and inform its residents, businesses and visitors. San Francisco wishes to create a better online experience for all, including the 95,000 residents with a disability, the 19.5% of residents who identify as Limited English Proficient (LEP), and the 22% of residents who rely on their mobile device to connect to the internet. To serve all San Franciscans effectively the City must provide equitable access to its digital content.

PURPOSE AND SCOPE

The Digital Accessibility and Inclusion Standard (DAIS) outlines what City departments must do to make their digital information, programs, activities and services accessible.

The standard applies to public-facing digital content that is:

- operated by or on behalf of the City, its departments and commissions
- created by or on behalf of City elected officials, employees, consultants and vendors
- primarily intended for use by City residents and visitors

STANDARD REQUIREMENTS

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

All City digital content must:

1. comply with the United States Department of Justice (DOJ) [Web Content Accessibility Guidelines Version 2.1 Level AA](#);

2. comply with the City's equitable design requirements and provide vital information (as defined by the San Francisco [Language Access Ordinance, Administrative Code Chapter 91)](#) for the public in plain language. In cases where vital information includes technical or legal language , a department should provide a summary in plain language;

3. comply with the City's [Language Access Ordinance (LAO)](#).

ROLES AND RESPONSIBILITIES

- **City Departments**
  - Develop new digital content and remediate existing content following this standard.
  - Identify a DAIS Coordinator and provide contact information to Committee on Information Technology (COIT) staff. This role should interact with all relevant internal stakeholders such as ADA Coordinators, LAO Liaisons and communication/technology leads within their department.

- Publish a website accessibility statement in a visible and intuitive website location, such as a sitewide footer or the department contact page. The statement must include the adopted standard, a point of contact, and be translated into the threshold languages.
- Ensure that City web content and mobile applications comply with federal, state and local disability access laws, including without limitation the DOJ Rule.
- Ensure that third-party vendors comply with the Web Content Accessibility Guidelines Version 2.1 Level AA when providing or creating web content or digital tools for the City. Work with the Office of Contract Administration during the bidding and procurement process to ensure that selected vendors' work product meet the City's accessibility requirements.
  Departments should consult with their internal LAO Liaisons on language access best practices. Departments are encouraged to have written translations of vital information reviewed by bilingual employees certified by the Department of Human Resources. If the department does not have multilingual staff, they may reach out to the Office of Civic Engagement and Immigrant Affairs (OCEIA) for additional support or use quality and accuracy checks. Departments are encouraged to request feedback on translations from bilingual staff at community groups whose clients receive services from the department.

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

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

- **Office of Civic Engagement and Immigrant Affairs**
  - Consult with departments on best practices governing translation of digital content and guidance on the LAO.
  - Supplement department language access needs via Citywide vendor contracts and OCEIA language specialists.
  - **Review department digital content to determine vital information**
  - Oversee department compliance with the LAO.

- **Committee on Information Technology**
  - Gather information from departments to support assessment of compliance with this standard.
  - Incorporate digital accessibility and inclusion in the evaluation of budgetary requests.
  - Update standard to define digital accessibility and inclusion standards for internal-facing digital content used by City employees and provide a timeline for their implementation.
  - Regularly convene subject matter experts to review and make updates to the standard as needed.
  - Report publicly and regularly on City department compliance with the standard.

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

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

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

THE CITY'S WEBSITE – SF.gov

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

Requirement 1: Web Content Accessibility Guidelines

STANDARD DETAILS

Pursuant to the April 2024 DOJ Rule, all City digital content, including web content and mobile applications, must follow all technical requirements of the [Web Content Accessibility Guidelines 2.1, Level AA](), and its four principles:

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

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

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

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

The [Digital Services Accessibility Guide]() offers details and tips for meeting these requirements.

IMPLEMENTATION TIMELINE

In April 2024 the United States Department of Justice specified that all state and local governments with a population of 50,000 or more, including San Francisco, must come into compliance with Web Content Accessibility Guidelines 2.1, Level AA no later than April 24, 2026.

In addition, no later than April 2026, COIT will approve an update to this standard to:
- define digital accessibility and inclusion standards for internal-facing digital content and
- provide a timeline for implementation.

EXCEPTIONS

Any exceptions to this standard must align with those outlined by the DOJ. The Mayor's Office on Disability will review all exception requests. A department requesting an exception must provide a written justification. Exception requests must include a plan for providing accommodation or modification to a member of the public upon request.

Requirement 2: Equitable Design Requirements and Plain Language

STANDARD DETAILS – Equitable Design Requirements

Equitable design improves websites and services for all users, including those with disabilities. Requirements include:

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

2. **Secure**
   - The [City's Cybersecurity Policy](#) outlines the technical requirements for making websites secure.

3. **Mobile first**
   - Websites should be designed to be easily accessed on mobile devices.
   - PDFs should be eliminated in favor of web pages because they do not work well on mobile devices. At minimum, any PDFs used must be accessible to someone using assistive technology such as a screen reader.

STANDARD DETAILS – Plain Language

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

Requirement 3: Language Access Ordinance

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

- All City departments serving the public provide fair language access
- Residents have a method to report departments out of compliance with the law
- Departments self-report that they are following the law

The Office of Civic Engagement and Immigrant Affairs oversees LAO compliance to support better service to San Francisco residents with limited English. This includes review of department digital content to confirm vital information.

COMPLIANCE

The ADA requires that local governments make online content accessible to people with disabilities that impact their ability to access online websites, applications, and documents.

The [LAO](#) requires City departments to translate written materials that provide vital information to the public about department services or programs. Material must be translated into the languages spoken by a Substantial Number of Limited English-Speaking Persons as defined by the Administrative Code.

RESOURCES

- [Digital Services Accessibility Guide](#): Technical guidance for website accessibility.
- [Digital Services Accessibility Tools and Resources](#): Collection of resources for testing and developing accessible content. It includes services to test accessibility and resources on creating accessible products, such as pdfs.

- [Digital Services Content Principles and Style Guide](#): Guidance for writing accessible website content.
- [Digital Services Visual Style Guide](#): Guidance for accessible website style.
- [Office of Civic Engagement and Immigrant Affairs Language Access Ordinance Resource Library](#): Resources for language translation and compliance with the Language Access Ordinance, including recommended vendors.
- [Hemingway App](#): Reviews reading level of written content and provides suggestions.
- [Reasonable Modification Policy](#): Explanation of the City's Reasonable Modification Policy and process for implementation.

DEFINITIONS

Digital Content: As defined in [Section 508 of the Rehabilitation Act](#), all types of electronic information, including multimedia, electronic documents, social media, and web content.

Mobile Applications: As defined in [Title II of the ADA](#), software applications that are downloaded and designed to run on mobile devices, such as smartphones and tablets.

Plain Language: As defined in [the federal Plain Writing Act of 2010 (Public Law 111-274)](#), plain language is clear, concise, well-organized writing and follows other best practices appropriate to the subject or field and intended audience.

Public Facing: As defined in [Section 508 of the Rehabilitation Act](#), content made available by a department to members of the general public. Usually, public facing content is published on the web (for example, on a department website, blog, form, or social media page). However, public facing content might also be made available in non-web formats, such as information displayed on screens or interactive kiosks in waiting areas. Digital content in a password-protected website or secure account that is accessible by City contractors does not fall under this definition.

Vital Information: As defined by the [LAO](#), vital information about a department's services or programs includes: applications or forms to participate in department programs or activities or to receive benefits or services; written notices of rights to, determination of, eligibility for, award of, denial of, loss of, or decreases in benefits or services, including the right to appeal any department's decision; written tests that do not assess English language competency, but test competency for a particular license or skill for which knowledge of written English is not required; notices advising Limited English-Speaking Persons of free language assistance; materials, including publicly-posted documents, explaining a department's services or programs; complaint forms; any other written documents related to direct services to the public that could impact the community or an individual seeking services from or participating in a program of a City department.

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

REFERENCES

[Department of Justice Ruling on Americans with Disabilities Act](#)
[Web Content Accessibility Guidelines 2.1](#)
[San Francisco Language Access Ordinance](#)