Digital Accessibility and Inclusion Standard

Committee on Information Technology

The City and County of San Francisco (City) is dedicated to serving all San Franciscans. To do this, we need to give equitable access to all of our digital services and web content. We must consider the need of San Franciscans, City staff, and anyone doing business with the City.

PURPOSE AND SCOPE

This standard explains what you need to do to make your web content and services accessible. We need to design and build services and content that everyone can access and understand.

These standards apply to public facing websites, online applications, and digital content. They apply to:
- everything online run by or for the City and County of San Francisco, its departments, and commissions
- digital content created by elected officials, employees, consultants, and vendors.

STANDARD REQUIREMENTS

All new City and County of San Francisco websites, online applications, and digital content are required to:

1. follow San Francisco's equitable design requirements and Level AA of the most recent [Web Content Accessibility Guidelines](#).

2. provide vital information for the public at a 5th grade level. In cases where technical or legal language is necessary, you must provide a summary at 5th grade level. Vital information is defined by the City's [Language Access Ordinance](#). See Definitions section for more details.

3. provide human translation of vital information in the threshold languages defined by the [Language Access Ordinance](#). This includes clear navigation to translations. Currently these languages are English, Chinese (Traditional Chinese), Spanish, and Filipino. Translation for other relevant languages is encouraged.

All existing content must follow this standard within two years of adoption. See Timeline section for details.

All City digital content must comply with all City, State, and Federal laws and regulations, and with all state and federal Constitutional guarantees, such as the Americans with Disabilities Act (ADA), Section 508 of the Rehabilitation Act, and the San Francisco Language Ordinance.

CURRENT SUPPORTED TECHNOLOGIES

The City's Digital Services team designs and maintains SF.gov. SF.gov is meant for residents to access City information and services and is available for all departments. SF.gov's design allows

access to users of 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 Digital Services to meet the City's accessibility standards through SF.gov.

All department websites are required to meet the standards described in this document. Departments not using SF.gov must ensure compliance with these standards.

BACKGROUND

The City and County of San Francisco designs websites and digital tools to empower all San Franciscans. About 95,000 San Franciscans have some kind of disability. Those disabilities can make it difficult to use websites, online applications, and digital content.[1] As well as meet accessibility compliance obligations defined in ADA Title II, we want to build a better online experience for everyone, particularly those who have disabilities or difficulty reading English.

In addition to disability access, there are other equity issues that the City must consider for digital access to be equitable.

- 1 in 3 San Franciscans is an immigrant. With 34.3% of its residents born outside of the U.S., San Francisco is one of the most culturally and linguistically diverse cities in the country.

- 19.5% of San Franciscans identify as Limited English Proficient (LEP). LEP refers to people who do not speak English as their first language. They may also have limited ability to read, write, speak, or understand English. 43.1% of San Franciscans over the age of 5 speak a language other than English at home.

- Low-income residents, seniors, and people who speak a language other than English are less likely to have a high-speed internet connection at home. 22% of residents without high-speed internet rely on their mobile device for internet access.[2] 60% of all visits to SF.gov are made on a mobile device.

STANDARD DETAILS – SAN FRANCISCO EQUITABLE DESIGN REQUIREMENTS

The equitable design requirements listed below make websites and services better for all users, including those with disabilities. They ensure that we include all San Franciscans when providing online services and information.

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

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[1] https://www.interactiveaccessibility.com/accessibility-statistics
[2] San Francisco Digital Inclusion Survey, 2018. https://sfmohcd.org/digital-equity

2. Secure

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

3. Mobile first

- Websites must 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 - ACCESSIBILITY REQUIREMENTS

All websites for the City and County of San Francisco must follow all technical requirements of the most recent Web Content Accessibility Guidelines, Level AA. At time of standard publication this means compliance with [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.

In addition, all websites must follow these specific Level AAA requirements:

- *Abbreviations***:** A mechanism for identifying the expanded meaning of abbreviations is available.
- *Attachments:* Attachments are accessible to everyone, including users who use assistive technology like screen readers.
- *Editing*: When web content is edited, it is re-tested for accessibility.
- *Help***:** Help in context is available.
- *Link text*: Make sure all links are provided at the point in the content at which they're useful without visibly displaying the URL or "here."
- *Pronunciation***:** There is a way for identifying pronunciation of words where their meaning is ambiguous.
- *Reduced Motion*: Respect a user's preference for reduced motion.
- *Skip to Main Content*: Allow screen reader users to easily skip repetitive navigation.
- *Unusual Words*: There is a way for identifying definitions of words or phrases used in an unusual or restricted way, including idioms and jargon.
- *User Testing:* User testing is a standard practice for ensuring accessibility.

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

IMPLEMENTATION TIMELINE

Departments must comply with the following deadlines over the course of next two years:

- **6 months**: Within six months of the standard's adoption, Departments must have a plan for reviewing existing content for compliance. If a Department develops a plan with the Digital Services team for migration to SF.gov this satisfies the requirement. Departments may consult with the Digital Services team about their accessibility review.

- **Year 1**: Within one year of the standard's adoption, Departments must complete their review of existing content for compliance. They should follow Digital Services guidelines for accessibility review.

- **Year 2**: Within two years of the standard's adoption, Departments must correct issues found with existing content. They should follow the Mayor's Office on Disability guidelines for resolving issues. At minimum, this remediation must include a plan to make existing content accessible on request. They must provide a clear way for members of the public to request equally effective access through a Reasonable Modification (as defined through guidelines for ADA Title II).

In addition, within **six months** of the standard's adoption, COIT will approve an update to this standard that defines digital accessibility and inclusion standards for internal digital content and provides a timeline for their implementation.

ROLES AND RESPONSIBILITIES

- **City and County of San Francisco Departments**
  o Develop new digital content following this standard.
  o Ensure that third-party vendors comply with this policy when providing or creating digital products for the City. Work with the Office of Contract Administration during the bidding and procurement process to ensure the City's accessibility requirements are met by vendors.
  o Departments should consult with their internal Language Access Ordinance Liaisons on language access best practices. Departments are encouraged to have the quality of written translations reviewed by bilingual employees who are fluent or certified by the Department of Human Resources. If the Department doesn't have multilingual staff, they should have quality and accuracy checks from external translators. Departments are encouraged to ask for feedback on translations from bilingual staff at community groups whose clients receive services from the Department. If the translated material involves legal language, Departments are encouraged to ask for feedback from a qualified attorney.

- **Digital Services**
  - Manage the SF.gov domain. Maintain accessibility standards on the SF.gov domain 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.
  - Regularly review these standards and recommend updates to COIT as needed.

- **Mayor's Office of Disability**
  - Offer guidance to City Departments on how to include users with disabilities in accessibility testing.
  - Provide guidance to City Departments in remediation of existing content.

- **Office of Civic Engagement and Immigrant Affairs**
  - Provide technical assistance to Departments with translation of digital materials and guidance on the City Language Access Ordinance.
  - Provide technical assistance to Departments in using Citywide contracts with language translation vendors.

- **Committee on Information Technology (COIT)**
  - Assess compliance with this standard.
  - Incorporate digital accessibility and inclusion in the evaluation of budgetary requests.
  - Update standard within 6 months to define digital accessibility and inclusion standards for internal digital content and provides a timeline for their implementation. Regularly convene subject matter experts to review and make additional updates to these standards as needed.

- **City Attorney**
  - Work with COIT, Office of Contract Administration, and Mayor's Office of Disability to develop language for procurement and contracts to comply with this standard.
  - May consult on translation of legal material if needed.

- **Office of Contract Administration**
  - Work with COIT, City Attorney's Office, and Mayor's Office of 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.

COMPLIANCE

The Americans with Disabilities Act (ADA) requires that online content be accessible to people with disabilities that impact their ability to access online websites, applications, and documents. Section 508 of the Rehabilitation Act requires compliance with the Web Content Accessibility Guidelines (WCAG). The COIT Digital Accessibility and Inclusion Standard follows WCAG 2.1 as the most recent version of such guidelines and sets a higher standard.

San Francisco's Language Access Ordinance requires Departments to translate written materials that provide vital information to the public about the Department's services or programs. They need to be translated into the languages spoken by a Substantial Number of Limited English Speaking Persons. The Office of Civic Engagement and Immigrant Affairs notifies Departments when a language is recognized as spoken by a Substantial Number of Limited English Speaking Persons.

EXCEPTIONS

Exceptions to the standard for specific applications or digital content will be reviewed and must be approved by both the Mayor's Office on Disability and the Policy Review Board (PRB) of the Committee on Information Technology. A Department requesting an exception must present the reasons why it is needed. The Department's request for an exception must include its plan for providing accommodation or modification to an individual upon request.

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, like 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

Applications: The term applications refers to application software, or a software that performs a task for a user.

Vital Information: As defined in city code (the City's Language Access Ordinance), vital information about a Department's services or programs includes: applications or forms to participate in a Department's program or activity or to receive its 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 advertising 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.

REFERENCES

Web Content Accessibility Guidelines 2.1
Section 508 of the Rehabilitation Act
San Francisco Language Access Ordinance