



**Cook County, Illinois
Bureau of Information Technology & Automation**

**Transition Plan
For
Web Accessibility Compliance**

V 1.0 – June 2006

Table of Contents

I. COMMITMENT	3
II. SELF-ASSESSMENT	3
A. Automated Software Assessment.....	3
B. Manual Assessment	3
III. TRANSITION PLAN	4
A. Self-Assessment	4
B. Plan	4
C. Timeline.....	4
D. Implementation Phases	4
1. <i>Phase I - Planning</i>	4
2. <i>Phase II – Plan Adoption and Education</i>	5
3. <i>Phase III - Deployment</i>	6
4. <i>Phase IV – Training on Accessibility Standards</i>	6
5. <i>Phase V – Implement New Policies & Maintain Compliance</i>	7
E. Exceptions	7
F. Post Transition Assessment	7
G. Resources and References	7
H. Visitor Feedback.....	8
IV. IMPLEMENTATION.....	8
V. PROPOSED TIMELINE	8
VI. CONCLUSION.....	8
VII. APPENDICES	8
A. Section 508 Web Accessibility Standards	8
<i>§1194.22 Web-based intranet and internet information and applications</i>	9
<i>Note to §1194.22:</i>	10
B. Web Content Accessibility Guidelines 1.0	11

I. COMMITMENT

Cook County is committed to providing equal access to all County government internet/web-based information and services.

In 1998, Congress amended the Rehabilitation Act to require Federal Agencies to make their electronic and information technology accessible to people with disabilities. Inaccessible technology interferes with an individual's ability to obtain and use information quickly and easily. Section 508 of the Rehabilitation Act of 1973 was enacted to eliminate barriers in information technology, to provide equal access to online services and web content for people with disabilities, and to encourage development of technologies that will help achieve accessibility to all new online services and information.

The primary county website (www.cookcountygov.com) was originally designed to be compliant with Section 508 guidelines, and the Plumtree/bea platform that will be the base for the County's new Enterprise Portal System was chosen in part for its strength in accessibility compliance. But the need exists for an overall county policy and compliance in all new and existing sites. All current County web sites will be re-designed for accessibility based in this plan so that persons with disabilities have access to the same internet/web-based information, services, and resources available to persons without disabilities.

The main purpose of this document is to describe the steps that Cook County will take to achieve the goal of developing County accessibility standards and providing equal access to electronic information and services.

II. SELF-ASSESSMENT

Using a set of web design standards established by the Federal Government known as Section 508 and following the World Wide Web Consortium's (W3C) best practices, Cook County will conduct a complete self-assessment of the current web content and related online services.

Cook County will employ two major approaches to self-assessment: automated software checks and manual checks.

A. Automated Software Assessment

There are several tools available for this type of assessment. We will choose the most commonly used tools available at the time we begin this assessment.

B. Manual Assessment

While the automated tools used for assessment can alleviate much of the burden involved, manual checks are still necessary for more detailed assessment often overlooked by software tools.

III. TRANSITION PLAN

A. Self-Assessment

Each department and/or agency will be responsible for reviewing the current level of accessibility for its own web site. Initially, however, the Bureau's internet project manager will conduct an overall evaluation of all current internet/web-based content and share that information with all web authors.

Upon creation of any new web content, the internet project manager and each department's web author is responsible for using the current web authoring software's accessibility tool.

B. Plan

Cook County is currently (as of June 2006) in the development of an enterprise-wide portal environment. In the process of development, a County-wide content committee will be developed as part of the portal's internal governance. This committee will be responsible for developing and adopting a Web Accessibility Policy for the County.

The portal development will adopt the guidelines set forth in this policy and assure that any web presence built in the portal is fully accessible to County standards.

The internet project manager is responsible for creating and maintaining an Transition Plan for bringing all internet/web-based content into compliance with the standards set forth in the Web Accessibility Policy.

All web authors responsible for web content hosted on the Cook County web servers or within the enterprise portal will be tasked with maintaining their own web content and/or web applications. As part of this Transition Plan, training will be offered to all web authors in web accessibility standards and in applying them to their own web content.

C. Timeline

The deadline for bringing all Cook County web content into full compliancy with previously mentioned standards will be one year from the adoption of this Web Accessibility Policy. The entire plan will take approximately nine months to complete in six phases (outlined in section D below) with Phase VI, the final phase, to continue indefinitely as this phase includes ongoing maintenance of our accessibility and compliance.

D. Implementation Phases

This section introduces the many phases of the implementation plan. The implementation portion of the Transition Plan achieves the goals established during Self-Assessment. The phases of implementation are briefly described below:

1. Phase I - Planning

This phase will commence after the County Content Committee is formed in the process of portal development and extends

approximately three months. The following are the tasks for this phase:

- a) Form County Content Committee
- b) Draft Web Accessibility Policy (WAP), based on Section 508 and W3C best practices
- c) Evaluate and select automated web accessibility assessment tools and usage policy to be included in WAP
- d) Create guidelines for manual guidelines for accessibility self-assessment to be included in WAP
- e) Work with portal developers to assure the draft guidelines are incorporated into the portal architecture and discuss any necessary adjustments
- f) Plan content for an informational web site on web accessibility to be incorporated in the web portal
- g) Develop a series of training courses on web accessibility for web authors
- h) Develop a database of all County web authors and web sites hosted on County and external servers

2. Phase II – Plan Adoption and Education

This phase will begin after the completion of Phase I and extend approximately three months. The following are the tasks for this phase:

- a) Content committee to finalize and adopt County Web Accessibility Policy
- b) Implement information/training sessions with department web authors for necessary department-wide changes
- c) Remove any easily removable barriers to access for persons with disabilities such as placing alternative text representations for images and graphics on main entry pages to the County website
- d) Work with portal developers to assure new web templates are based on accessibility standards
- e) Conduct manual self-assessment of new web templates
- f) Conduct automated testing of new web templates using accessibility assessment tools
- g) Make any adjustments based on self-assessments
- h) Prepare to request members of the community with disabilities to conduct testing for accessibility of new web templates

- i) Present new web template to superiors and content committee for approval
- j) Begin contacting departments to schedule transition to new web template after it has successfully met ADA requirements

**The milestone for phase II is to have an adopted County Web Accessibility Plan and trained web authors.

3. Phase III - Deployment

This phase will begin after the completion of Phase II and extend approximately three months. The following are the tasks for this phase:

- a) Departments and BITA to begin to move content into the portal through the new content management system, using the accessibility checks and guides
- b) Make any adjustments to policy, based on discovery during initial content entry period
- c) Conduct information sessions announcing new web content development policies and procedures
- d) Ensure all new content is created according to new standards

**The milestone for Phase III is to have completed web design policies in place and classes for web authors underway.

4. Phase IV – Training on Accessibility Standards

This phase will begin after the completion of Phase III and then remain open after the tasks are initially completed, as they call for ongoing review and adaptation. The following are the tasks for this phase:

- a) Provide further training for web authors on long-term strategies for maintaining web accessibility on new or modified web content or web applications
- b) Provide further training as needed for web authors on best practices for web development/design
- c) Ensure new employees responsible for web content are adequately trained in web accessibility standards, policies, and best practices

**The milestone for Phase IV is to have all web authors trained in adopted web accessibility standards, policies, and best practices.

5. *Phase V – Implement New Policies & Maintain Compliance*

This phase will begin after the initial implementation of Phase IV tasks and be ongoing in the County's web development. The following are the tasks for this phase:

- a) Implement new Web Accessibility Policies with regard to long-term maintenance
- b) Conduct annual self-assessments
- c) Conduct annual assessments by members of community with disabilities

**The milestone for Phase V is to have policies documented and disseminated to all web authors
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E. Exceptions

Some types of files will not be included in the modifications or retrofitting for web accessibility standards due to the nature of the file type and/or age of technology involved.

However, if an individual with a disability requests information that is published in any inaccessible format, each web author will provide the requested information in a format accessible within a reasonable amount of time. Authors will provide information on how to obtain these alternate formats on the website with their content.

F. Post Transition Assessment

One of the most important aspects of this process is the post-transition assessment. This assessment will provide us with critical information about our level of compliancy against the web design standards for accessibility and best practices within the Information Technology industry.

Cook County will conduct a similar self-assessment as was conducted at the beginning of the plan (Part II, Self-Assessment). If the results indicate noncompliance in any of the key areas, we will address those issues immediately.

Long-term maintenance of web accessibility will become part of our normal operations with regard to web-related content, internet web applications and similar online services.

G. Resources and References

Section 508 Standards
<http://www.serction508.gov/>

World Wide Web Consortium. Web Accessibility Initiatives

<http://www.w3.org/WAI>

H. Visitor Feedback

Upon receipt of a comment or complaint, web authors will provide individuals with the ADA grievance procedure outlined in Cook County's Accessibility Policy.

IV. IMPLEMENTATION

The implementation of the Web Accessibility Transition Plan will be carried out in a series of phases. Each phase is described in more detail in Section III, Part D of the above Transition Plan.

V. PROPOSED TIMELINE

The timeline will be revised as priorities change during the project. The current County website (www.cookcountygov.com – as of June 2006) was designed to be compliant with Section 508 and some other basic modifications have already been made on the main County web pages in order to remove the most immediate barriers to access for persons with disabilities.

The bulk of the timeline will be dedicated to the re-design and deployment of the new Cook County web template. This web template will be re-designed based on the Federal Government's Section 508 standards as well as the W3C's Web Accessibility Initiative, which are described in further detail in Appendix A and B respectively.

The timeline for this project will extend over a twelve month period. There are some items in the implementation plan that will be ongoing both throughout the plan and beyond.

VI. CONCLUSION

Cook County will remain committed to providing equal access to online web content and related services. The Bureau of Information Technology and Automation will be responsible for implementing and maintaining the contents of this Transition Plan with the assistance of the departmental web authors.

VII. APPENDICES

A. Section 508 Web Accessibility Standards

The following list of standards can be found in their entirety on the Section508.org website at the following web address:
<http://www.section508.gov/index.cfm?FuseAction=Content&ID=12>

If you have any questions, please refer to this website.

§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.
- (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 Access Board – an independent Federal agency committed to design that is accessible to persons with disabilities – 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>.

B. Web Accessibility Initiatives and Guidelines

The Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C) provides a section that overviews content accessibility guidelines and techniques. This site takes each of the guidelines and assigns checkpoints on how to implement that guideline. For more information, please visit their website at <http://www.w3.org/WAI/>.