



## Legislative Council Staff

*Nonpartisan Services for Colorado's Legislature*

# Memorandum

April 2025

**TO:** Interested Persons  
**FROM:** Annabelle Tracy, IT Accessibility Manager  
**SUBJECT:** Colorado General Assembly Digital Accessibility Report

## Purpose

The Colorado General Assembly is committed providing all individuals with the ability to participate fully in the programs, services, and activities of the General Assembly, in accordance with the requirements of Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990 ("ADA"), and relevant Colorado statutes.

The staff of the legislative branch of the state of Colorado includes the state House of Representatives Staff, the state Senate Staff, and the General Assembly's nonpartisan staff agencies: the Legislative Council Staff; the Office of Legislative Legal Services, including the Office of Legislative Workplace Relations; the Joint Budget Committee Staff; and the Office of the State Auditor.

Pursuant to Section 24-34-802 (1)(c)(II), C.R.S., this report outlines the ongoing efforts of staff of the legislative branch of the state of Colorado to improve and maintain a digital landscape that meets or exceeds accessibility standards and is inclusive and accessible to all.

## Accessibility Standards

The Colorado General Assembly is engaged in ongoing efforts to ensure that legislative digital content meets or exceeds the following standards and guidelines:

- Levels A or AA success criteria in the most recent official version of the Web Content Accessibility Guidelines (WCAG) published by the World Wide Web Consortium (W3C);
- 8 CCR 1501-11 Rules Establishing Technology Accessibility Standards promulgated by the Colorado Governor's Office of Information Technology pursuant to Section 24-85-103, C.R.S.; and
- the production and remediation of PDF documents to meet ISO 14289-1:2014. Document



management applications — Electronic document file format enhancement for accessibility - Part 1: Use of ISO 32000-1 (PDF/UA-1).

## Accessibility Approach

Accessibility is integrated into all aspects of the organization, including but not limited to digital procurement, governance, application development, and publications. Ensuring accessibility requires an ongoing and iterative process as follows:

1. **Inventory.** Compiling an inventory allows staff to identify the scope of legislative digital products required to undergo changes, and informs the careful consideration and prioritization of existing products.
2. **Auditing.** Auditing allows staff to understand the scope and methodology of remediation that is required for each digital product.
3. **Remediation.** The remediation process implements the recommendations of the audit to ensure that digital products are accessible.
4. **Accommodation.** Establishing a reasonable accommodation request process enables a person with a disability to request the remediation of products not in active use or that may require additional alteration.

## Ongoing Efforts

The following efforts in planning, budgeting, and policy development; personnel and administration; collaboration; procurement, software, and tools; audit, evaluation, and remediation; and hardware and accommodation demonstrate the ongoing work towards compliance with relevant federal and state law.

## Planning, Budgeting, and Policy Development

**During the 2023-24 fiscal year**, efforts in planning, budgeting, and policy development included:

- the creation of a digital accessibility roadmap and plan;
- the inventory and prioritization of digital products produced and procured by staff;



- updates to the Colorado Legislative Branch Policy on Services for Persons with Disabilities to include relevant language surrounding digital accessibility and reasonable accommodation;
- the creation of a technology accessibility statement and accommodation procedure in accordance with 8 CCR 1501-11 (11.6);
- the creation of an accommodation request webform and PDF form, enabling an individual to request accommodation in accordance with the Section 24-34-802 (1)(c)(II), C.R.S. and the updated Policy on Services for Persons with Disabilities;
- the creation of a central accessibility web page, located in the footer of the Colorado General Assembly website at [leg.colorado.gov/accessibility](https://leg.colorado.gov/accessibility); and
- the development of internal standard operating procedures and resources.

**During the 2024-25 fiscal year**, efforts in planning, budgeting, and policy development include:

- the budget for direct spending on accessibility totaling \$1.77 million in FY 2024-25, which represents 2.1 percent of total and 2.2 percent of General Fund appropriations to the Legislative Department. This excludes indirect spending on accessibility, which has not been quantified but likely exceeds direct spending. Indirect spending includes staff and operating budgets that improve accessibility but are implemented outside of the accessibility team;
- the creation of a quarterly accessibility report-to-date in accordance with Section 24-34-802 (1)(c)(II), C.R.S.;
- the ongoing maintenance of the content and resources found at [leg.colorado.gov/accessibility](https://leg.colorado.gov/accessibility); and
- the ongoing development of internal standard operating procedures and resources.

## **Personnel and Administration**

**During the 2023-24 fiscal year**, personnel and administrative efforts included:

- hiring a senior accessibility analyst to coordinate the digital accessibility efforts of staff in the first quarter of the 2023-24 fiscal year;
- contracting with additional accessibility-focused personnel during the 2023-24 fiscal year;



- the allocation of existing administrative resources within each legislative service agency; and
- progress toward ongoing staff education and training in digital accessibility core competencies, best practices, software, and tools.

**During the 2024-25 fiscal year,** personnel and administrative efforts include:

- establishing an accessibility team within the Legislative Information Services staff section;
- the allocation of existing administrative resources within each legislative service agency;
- progress toward ongoing staff education and training in digital accessibility core competencies, best practices, software, and tools;
- hiring several accessibility-focused personnel specializing in web accessibility in the first quarter of the 2024-25 fiscal year;
- hiring several accessibility-focused personnel specializing in document accessibility in the second quarter of the 2024-25 fiscal year;
- contracting with several accessibility-focused personnel specializing in web accessibility evaluation in the third quarter of the 2024-25 fiscal year; and
- contracting with several accessibility-focused personnel specializing in web accessibility remediation in the third quarter of the 2024-25 fiscal year.

## **Collaboration**

**During the 2023-24 and 2024-25 fiscal years,** ongoing efforts in collaboration include:

- collaboration throughout the legislative branch, including the creation of the legislative staff digital accessibility working group and team-specific working groups;
- collaboration on accessibility standards and practices with the Colorado Governor's Office of Information Technology, various state entities, and global digital accessibility technical working groups;
- collaboration with outside organizations and vendors on the development of accessibility tools; and
- collaboration in testing and evaluation of remediated digital products with the disability community.



## **Procurement, Software, and Tools**

**During the 2023-24 and 2024-25 fiscal years,** ongoing efforts in procurement, software and tools include:

- inventory and evaluation of software and tools in active use by staff;
- progress towards establishing an internal accessible procurement process;
- purchase of the several accessibility-related software and tools in the 2024-25 fiscal year, including migration to new accessible email and collaboration software;
- the training of legislative staff in accessibility best practices for using the new email and collaboration software; and
- the procurement of additional hardware devices.

## **Audit, Evaluation, and Remediation**

### **Web Accessibility**

**During the 2023-24 fiscal year,** efforts in audit, evaluation, and remediation within the web accessibility space included:

- the completion of a third-party initial accessibility audit of key legislative websites and applications in active use;
- progress towards the remediation of issues identified in the third-party audit of legislative the websites and applications;
- the introduction of accessibility-focused practices in the software development lifecycle;
- the creation of a centrally located accessibility page in the footer of the Colorado General Assembly website;
- the development of a comprehensive automated and manual testing approach to ensure accessibility and usability of web content, including:
  - automated and on-demand evaluation with Siteimprove; and similar web accessibility evaluation tools;
  - manual content reviews;



- manual usability and keyboard navigation testing;
- manual testing with screen readers and other types of assistive technology; and
- manual testing with visual difference emulators.
- progress towards the development of a new, accessible Colorado General Assembly website;
- progress toward developing an accessible and user friendly design system for use in legislative websites and applications; and
- progress toward developing an accessible web version of the House and Senate daily calendars, bills, amendments, committee reports, and official publications of the Colorado General Assembly.

**During the 2024-25 fiscal year,** efforts in audit, evaluation, and remediation within the web accessibility space include:

- the [beta release](#) of the new, accessible Colorado General Assembly website;
- the release of an accessible web version of the House and Senate daily calendars for the first regular session of the 75th Colorado General Assembly;
- progress toward developing an accessible web version of bills, amendments, and committee reports, and official publications of the Colorado General Assembly;
- progress towards the remediation of accessibility issues identified in the 2023-24 fiscal year third-party accessibility audit of legislative websites and applications;
- the initiation of a third-party accessibility audit of additional legislative websites and applications released during the previous fiscal year;
- the ongoing implementation of the new, accessible legislative design system across key websites and applications in active use;
- the ongoing involvement of accessibility in the software development lifecycle;
- the ongoing use and enhancement of a comprehensive automated and manual testing approach to ensure accessibility and usability of web content; and
- the prioritization and remediation of accessibility barriers in legislative websites and applications identified by members of the disability community.



## Document Accessibility

**During the 2023-24 fiscal year,** efforts in audit, evaluation, and remediation within the document accessibility space included:

- the inventory of legislative publications;
- the completion of the third-party initial accessibility audit of legislative publications;
- the development of a document remediation intake and tracking process;
- the remediation of:
  - pre-existing legislative publications in active use;
  - prioritized pre-existing legislative publications not in active use; and
  - newly created legislative publications.
- the evaluation and remediation of existing publication processes;
- the development of a comprehensive automated and manual testing and remediation approach to ensure the accessibility and usability of PDF documents, including:
  - automated evaluation with leading document accessibility software;
  - manual content reviews;
  - manual usability and keyboard navigation testing;
  - manual testing with screen readers and other types of assistive technology; and
  - manual testing with visual difference emulators.
- the creation of guidance material for staff to enable the production of accessible digital documents; and
- training legislative staff in document accessibility best practices.

**During the 2024-25 fiscal year,** efforts in audit, evaluation, and remediation within the document accessibility space include:

- the ongoing inventory of legislative publications;
- the ongoing development of internal document remediation standards and procedures;
- the ongoing use and enhancement of a comprehensive automated and manual testing



approach to ensure the accessibility and usability of digital documents;

- the ongoing remediation of:
  - pre-existing legislative publications in active use;
  - prioritized pre-existing legislative publications not in active use; and
  - newly created legislative publications.

As of April 2025, the total number of PDF pages remediated is approximately 47,000.

- the ongoing evaluation and remediation of existing publication processes;
- the creation of guidance material to enable organizations contracted with legislative agencies to produce more accessible digital content;
- the ongoing creation of guidance material for legislative staff to enable the production of accessible digital documents;
- the ongoing development of customized internal tools and document templates designed to streamline existing publication processes and enable the production of more accessible digital documents;
- the ongoing training of legislative staff in document accessibility best practices and the use of internal accessibility tools; and
- the prioritization and remediation of accessibility barriers in legislative publications identified by members of the disability community.

## **Hardware and Accommodation Systems**

**During the 2023–24 and 2024–25 fiscal years,** efforts related to hardware and accommodation systems include:

- the ongoing evaluation of existing hardware and systems used in legislative proceedings and other legislative activities;
- the ongoing development of a streamlined internal accommodation system and procedures; and
- the ongoing training of staff in accommodation procedures for legislative proceedings.





The Colorado General Assembly is committed to providing equitable access and effective communication to all individuals in accordance with the requirements of relevant federal and state law. The efforts outlined in this report intend to demonstrate the ongoing commitment and comprehensive approach of legislative staff toward compliance with those requirements.