



**State of Maine**  
**Department of Administrative & Financial Services**  
**Maine Information Technology**

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**Digital Accessibility Strategic Plan**

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## 1.0 Executive Summary:

- 1.1 Technology has become an integral part of our everyday lives. This means that at an *organizational* level, it is essential that we make our *digital information and services* accessible to the largest possible audience. This includes people with disabilities, who make up about 16% of Maine’s population<sup>1</sup>.
- 1.2 When we make our digital information and services accessible, tangible benefits are realized for everyone, not just individuals with disabilities:
  - 1.2.1 We improve the customer experience, and customer satisfaction
  - 1.2.2 We broaden our service delivery, by removing barriers to access
  - 1.2.3 We allow for a more diverse, and inclusive workforce
  - 1.2.4 We address legal, regulatory, and compliance issues
- 1.3 Our *digital accessibility* approach is inconsistent, meaning we do not always proactively ensure that the digital information and services that we develop, procure, or provide are accessible. This illustrates the need for a strategic plan.
- 1.4 At the core of this plan are the mission and vision statements. These represent the foundation we build from, emphasizing our commitment and our essential values, and that digital accessibility needs to be a sustainable, long-term effort.
- 1.5 Our plan structure is purposefully aligned with widely recognized standards, guidelines, and models. This leverages the work of subject matter experts, and provides greater consistency of our requirements, with those of other entities.
- 1.6 The plan goals, objectives, strategies, and actions are tied directly to a model that is aimed at improving the organizational maturity for ten key dimensions:
  - 1.6.1 Governance, risk management and compliance; communication; policies and standards; regulatory; fiscal management; software development lifecycle; testing; documentation/support; procurement; and training.
- 1.7 This model consists of five levels (with five being the highest). Our aim is to move from maturity level 1 (initial) to level 3 (defined) for each dimension.
- 1.8 Appendix A at the end of this plan provides a high-level illustration of the relationships between the various plan components.
- 1.9 This plan represents our strategic five-year roadmap to move from our current state (level 1) to our desired future state (level 3). Success requires organizational awareness, commitment, collaboration, sufficient resources, leadership support, and a transformation from a reactive to a proactive culture.

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<sup>1</sup> Compiled from the [University of New Hampshire’s 2017 Annual Disability Statistics Supplement](#).

## 2.0 Introduction

- 2.1 Anyone can experience a disability at any point in their life. This could be you, your parent, child, sibling, grandparent, co-worker, friend, or acquaintance. Some people are born with disabilities, others acquire them at various stages of life due to medical conditions, accidents, aging, or other factors.
- 2.2 Disabilities may be permanent, temporary, can vary in severity, and can get progressively better, or worse. A person may have one or multiple disabilities at any given time.
- 2.3 By developing, procuring, and providing accessible information and services, we remove barriers to people with vision, auditory, physical, cognitive, and/or speech disabilities. Ensuring digital accessibility allows us to include rather than exclude people with disabilities, affording them an equal opportunity and experience as those without disabilities. We yield a meaningful mutual benefit.
- 2.4 This plan focuses on the positive benefits of digital accessibility, and negative consequences that can be minimized or avoided. Ensuring digital accessibility removes barriers, which increases the likelihood of satisfied users, and decreases the potential risks of user frustration, complaints, and/or lawsuits.
- 2.5 Two distinct groups of consumers utilize our digital information and services. Internal content is typically consumed by state personnel, and external content is typically consumed by members of the public and/or business partners. Digital accessibility risks, standards, and guidelines are similar, but implications may vary depending on the audience. A member of the public may be denied critical information at an important time, whereas an employee may be unable to complete their job duties, but both may seek relief through the legal system under the *Americans with Disabilities Act (ADA)* or other applicable laws.
- 2.6 Ensuring digital accessibility is critical for all consumers. If existing or legacy information and services are not accessible, this could trigger frustration and complaints from people with disabilities who encounter issues. Users need a clear way to communicate issues to us for feedback and attention, and we need a way to track and prioritize issues for resolution and process improvement.
- 2.7 Our primary focus with this plan is point-forward, so new, and replacements to existing, information and services factor in digital accessibility up-front, and we do not propagate accessibility gaps that could impact users. Given accessibility advances, making new information and services accessible, is often easier and less expensive than making legacy information and services accessible.
- 2.8 This focus recognizes our finite resources; however, it does not preclude us from prioritizing and filling existing accessibility gaps, through fixes, upgrades, or replacements, especially in instances where user issues have been reported.

### 3.0 Mission Statement:

3.1 The State of Maine fully supports the Americans with Disabilities Act, is dedicated to meeting the needs of its employees and citizens with disabilities, and is committed to making its digital information and services accessible and usable by everyone; by implementing policies, standards, procedures, and best practices, that help ensure the State of Maine buys, builds, creates, uses, and maintains accessible digital information and services.

### 4.0 Vision Statement:

4.1 Our vision is to make the State of Maine's digital information and services available to, accessible to, and usable by, the broadest audience possible, in a sustainable manner, through broad organizational buy-in and collaboration.

### 5.0 Strategic Plan Structure:

5.1 The scope of this plan encompasses all digital information and services categories (*electronic content, software, hardware, support documentation and services*) that are utilized by the public and/or employees.

5.2 This plan aligns with state statute, [Title 5, Chapter 163: Office of Information Technology](#)<sup>2</sup>, which gives the Chief Information Officer the responsibility to set policies and standards for the implementation and use of information and telecommunications technologies, including privacy and security standards, and standards of the federal Americans with Disabilities Act (ADA).

5.3 The State of Maine strategic digital accessibility approach is in alignment with internationally recognized standards and guidelines ([Section 508 Standards](#)<sup>3</sup>; [Web Content Accessibility Guidelines \(WCAG\)](#)<sup>4</sup>) and is based upon the [Digital Accessibility Maturity Model \(DAMM\)](#)<sup>5</sup>.

5.4 The DAMM consists of ten dimensions with associated organizational maturity levels. The levels consist of a 1 to 5 scale (with five being the highest) to measure the maturity of digital accessibility programs. The dimensions are:

5.4.1 Governance and risk management; communication; policies and standards; regulatory compliance; fiscal management; incorporation into the software development lifecycle; testing and validation; support and documentation; procurement; and training.

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<sup>2</sup> <http://legislature.maine.gov/statutes/5/title5ch163sec0.html>

<sup>3</sup> <https://www.section508.gov/manage/laws-and-policies>

<sup>4</sup> <http://www.w3.org/TR/WCAG20/>

<sup>5</sup> <https://www.levelaccess.com/the-digital-accessibility-maturity-model-introduction-to-damm/>

## 6.0 Core Values:

### 6.1 Our core values are:

- 6.1.1 **Value 1** – Recognizing the importance of developing and sustaining a digital accessibility culture throughout the entire organization.
- 6.1.2 **Value 2** - Leveraging national and international standards, guidelines and best practices, to the greatest extent possible, into our governance, policy, and testing efforts.
- 6.1.3 **Value 3** - Providing all customers and employees, including those with disabilities, equally effective access, to the greatest extent possible, to our State information and services.
- 6.1.4 **Value 4** - Assuring that individuals with digital accessibility roles have enough training and resources, to properly complete their duties, with accessibility in mind.

## 7.0 Goals and Objectives:

- 7.1 Based on an internal organizational maturity level assessment, we are at level 1 (initial) for each of the DAMM dimensions. As part of our five-year strategy, our overarching aim is to reach a minimum of level 3 (defined), for each dimension. This will be a gradual process, with some dimensions reaching level 3 faster than others. Each defined goal relates to a DAMM dimension.
- 7.2 While DAMM specifics vary across the dimensions, the levels have parallels. Level 1 organizations typically are starting to get the necessary structure, documentation, and organizational commitment in place. Level 3 organizations, typically have a base, working structure in place, that could be refined, and optimized as the accessibility program becomes more mature.
- 7.3 Our goals and objectives, align with the following more overarching core organizational values:
  - 7.3.1 Forge a strong, unified leadership team with a clear, shared sense of direction and accountability.
  - 7.3.2 Build a unified culture and effective leaders at all levels.
  - 7.3.3 Articulate a comprehensive strategy-to-execution framework to help coordinate and prioritize the focus for 2020 and beyond.
  - 7.3.4 Build a strong customer centric and results orientation culture.
  - 7.3.5 Employ a results-oriented methodology.

**7.4 Goal 1** – Implement a digital accessibility governance, risk management, and compliance framework.

- 7.4.1 Successful digital accessibility programs identify, measure, and prioritize risk, ensure compliance with policies and other pertinent requirements, and establish a consistent organizational governance model.
- 7.4.2 When fully accessible information and services are not available, or accessibility issues are encountered, we need an organizational understanding to identify how to best mitigate risk, and to take proactive steps toward resolution or improvement.
- 7.4.3 Objectives include:
  - 7.4.3.1 Affirm leadership commitment to digital accessibility.
  - 7.4.3.2 Solidify compliance, risk management, and governance ownership.
  - 7.4.3.3 Reduce risk from inaccessible information and services.
  - 7.4.3.4 Transition to a proactive risk management strategy.

**7.5 Goal 2** – Cultivate a digital accessibility organizational culture through internal and external communication activities.

- 7.5.1 To successfully shift our digital accessibility culture from reactive to proactive, we need greater outreach, awareness, and education. Our communication framework needs to be sustainable long-term, given that individuals at all levels of the organization come and go over time.
- 7.5.2 Objectives include:
  - 7.5.2.1 Increase internal and external awareness and outreach.
  - 7.5.2.2 Improve organizational access to resources and tools.

**7.6 Goal 3** – Maintain up-to-date digital accessibility policies and standards.

- 7.6.1 Employing policies and standards that remain in-line with nationally and internationally recognized standards and guidelines, provides greater consistency within our organization and other organizations, and with expectations from vendors.
- 7.6.2 Objectives include:
  - 7.6.2.1 Increase our policy and standard update frequency.
  - 7.6.2.2 Expand organizational communication of policies and standards.

**7.7 Goal 4 – Foster strategic digital accessibility partnerships, in support of organizational regulatory processes.**

7.7.1 Collaboration across the organization is key to establishing collective stakeholder buy-in and ownership. This is essential for remediation plans, complaint and dispute resolution, and meeting any required regulatory filing deadlines.

7.7.2 To maximize success, accessibility needs to be proactively built-into activities and projects up-front. This allows for greater efficiency from a cost and resource perspective and avoids unplanned and potentially significant delays and resource drains, due to subsequent re-work.

7.7.3 Objectives include:

7.7.3.1 Expand agency partner outreach.

7.7.3.2 Increase collaboration with State Americans with Disabilities Act (ADA) Coordinators and Equal Employment Opportunity (EEO) Coordinators.

7.7.3.3 Extend utilization of the Information Technology Accessibility Committee (ITAC) advisory group.

7.7.3.4 Improve utilization of existing forums (e.g. web coordinators group, webmaster group).

7.7.3.5 Share information and collaborate with other states and other groups (University System, etc.).

7.7.3.6 Build an increased organizational awareness of existing digital accessibility issues and the importance of addressing them.

7.7.3.7 Enhance reporting and recordkeeping of conformance, compliance, and corrective action plans.

**7.8 Goal 5 – Insure necessary funding, resources, and fiscal management to support defined digital accessibility program efforts.**

7.8.1 The digital accessibility program, which this strategic plan is directly aligned with, requires enough funding and resources to be successful.

7.8.2 Objectives include:

7.8.2.1 Amass quantitative information to support the business case and justification for digital accessibility program efforts.

7.8.2.2 Establish a long-term funding approach, to ensure the continued viability of strategic digital accessibility efforts.



**7.9 Goal 6** – Incorporate digital accessibility organizationally into all development lifecycle stages.

- 7.9.1 Adopting digital accessibility into the development lifecycle as early and as often as possible, will yield more products and services that are designed to be functionally usable to individuals with disabilities.
- 7.9.2 The entire lifecycle (including post-implementation) needs to be considered. After implementation, regular updates are important to stay up-to-date with technology, security, and accessibility standards.
- 7.9.3 Objectives include:
  - 7.9.3.1 Incorporate good accessibility practices as a core design component.
  - 7.9.3.2 Add digital accessibility roles and responsibilities throughout the development process.
  - 7.9.3.3 Improve workflow patterns and scenarios to allow for better planning of the implementation of digital accessibility into the development lifecycle.
  - 7.9.3.4 Enhance digital accessibility knowledge of developers, throughout the lifecycle.
  - 7.9.3.5 Extend design and development to be inclusive of users with disabilities.

**7.10 Goal 7** – Build a consistent, enterprise-approach to accessibility testing.

- 7.10.1 With enterprise-level testing, we empower the organization to incorporate testing up-front in project, design, and development efforts, while still maintaining necessary central oversight by the Accessibility Team to ensure testing completeness and consistency.
- 7.10.2 Objectives include:
  - 7.10.2.1 Strengthen quality assurance by testing for, and tracking, accessibility issues within code.
  - 7.10.2.2 Grow testing consistency throughout project and development efforts.
  - 7.10.2.3 Increase alignment with widely utilized testing approaches, based on globally recognized standards and guidelines.
  - 7.10.2.4 Improve the completeness, consistency, and understanding of reporting results.
  - 7.10.2.5 Extend testing to include user/usability testing.

**7.11 Goal 8** – Construct an organizational digital accessibility support model, and accessible documentation, to meet the communication needs of users with disabilities.

7.11.1 Providing accessible documentation and having a consistent, defined workflow for handling accessibility issues will yield a better experience for people with disabilities who use our digital information and services.

7.11.2 Objectives include:

7.11.2.1 Augment existing infrastructure to allow for greater digital accessibility documentation, support, and tracking.

7.11.2.2 Build measurable metrics to demonstrate progress made.

**7.12 Goal 9** – Integrate digital accessibility into procurement and vendor management activities.

7.12.1 Ensuring that digital accessibility expectations are clearly defined in solicitations, contracts, and other procurement instruments, allows for a greater level of vendor compliance.

7.12.2 Objectives include:

7.12.2.1 Extend the procurement development, evaluation, and review processes to factor in digital accessibility compliance.

7.12.2.2 Improve the effectiveness of addressing non-compliance and escalation of digital accessibility procurement issues.

**7.13 Goal 10** – Promote and ensure the delivery of digital accessibility training throughout the organization.

7.13.1 Ensuring that personnel have appropriate and effective training, for overall awareness, and specific to their job roles, will foster a higher level of accessibility and usability for our digital information and services.

7.13.2 Objectives include:

7.13.2.1 Boost organizational digital accessibility awareness.

7.13.2.2 Expand appropriate role-based digital accessibility training.

## **8.0 Strategies:**

8.1 Our five-year strategies are aligned to our digital accessibility goals. The goals represent the “what”, while the associated strategies identify the “how”. Each strategy has actions defined, which represent the specific steps that will be taken to move our organizational digital accessibility maturity forward.

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- 8.2 While our goals correlate with DAMM dimensions, strategies may not directly correlate, due to our unique organizational characteristics. This means there is some level of interpretation involved associating strategies to the dimensions.
- 8.3 The “who” is not identified for the strategies and actions. While we anticipate the accessibility team will take the lead for many, and be involved with all, this is a collective organizational undertaking.
- 8.4 As a result, the accessibility team, may involve others for leadership, buy-in, and guidance for specific strategies and actions. Individuals and groups within, and outside, of the organization may serve various roles, including advisory, consultation, collaboration, and subject-matter-expert.
- 8.5 In association with this plan, a separate Plan of Action and Milestones (POA&M) will be utilized to track the progress made, and the individuals involved with each defined action associated with our Digital Accessibility program.
- 8.6 The success of these strategies depends greatly on leadership support, sufficient resources, and a transformation from a reactive to a proactive organizational digital accessibility culture. The absence of any of these, in whole, or in part, represents a risk to achieving success. Given that these are more overarching, risks are not identified at the individual strategy-level.
- 8.7 **Strategy 1** – Establish organizational expectations regarding governance, risk management, and compliance.
- 8.7.1 Identifying, classifying, and prioritizing risks, and monitoring compliance with published policies and standards, are critical components of the overall sustained governance of our digital accessibility program.
  - 8.7.2 This strategy is aimed at achieving a consistent awareness and understanding of risk management and compliance requirements and enforcement options.
  - 8.7.3 Actions include:
    - 8.7.3.1 Define scope, stakeholders, roles, and responsibilities.
    - 8.7.3.2 Identify required *artifacts* and content.
    - 8.7.3.3 Review existing artifacts, to identify what is already covered, and where gaps exist.
    - 8.7.3.4 Create/update artifacts to match identified needs.
    - 8.7.3.5 Publish updated artifacts, upon organizational approval, to validate leadership support and commitment.
    - 8.7.3.6 Perform regular risk assessments of agency digital content through standardized testing.

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8.7.3.7 Establish a communication mechanism and/or forum to apprise stakeholders of developments, status, and decision-points.

8.8 **Strategy 2** – Communicate governance, risk management, and compliance expectations throughout the organization.

8.8.1 As individuals gain a clearer understanding of the requirements, risks, and importance of compliance, this model will continue to mature, resulting in a more proactive governance approach.

8.8.2 Actions include:

8.8.2.1 Define the audience(s) to communicate with.

8.8.2.2 Identify the content pertinent to each audience.

8.8.2.3 Determine the communication methodology for each audience.

8.8.2.4 Share digital content test results with content owners, for awareness and action.

8.9 **Strategy 3** – Sustain the governance, compliance, and risk management program.

8.9.1 Risks, and associated compliance requirements evolve over time, as do people, and organizational needs. Content and communication need to be up-to-date in response to these dynamics.

8.9.2 Actions include:

8.9.2.1 Set a review and update schedule for each governance artifact.

8.9.2.2 Set a communication model to update existing individuals of changes, and to create initial awareness for new individuals.

8.10 **Strategy 4** – Promote the importance of digital accessibility throughout the organization.

8.10.1 Greater global awareness and understanding will lead to a greater commitment to digital accessibility throughout our organization.

8.10.2 Actions include:

8.10.2.1 Adopt an overarching organizational accessibility statement.

8.10.2.2 Identify content and resources that will lead to greater awareness and understanding, either created internally or harvested from other established sources.

8.10.2.3 Establish methods and forums to communicate digital accessibility, either created or built upon what already exists.

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8.10.2.4 Implement a digital accessibility awareness and outreach program, utilizing established methods and forums.

8.10.2.5 Establish a feedback mechanism for individuals to share their input regarding the digital accessibility program.

8.11 **Strategy 5** – Form organizational digital accessibility leadership roles.

8.11.1 Individual(s) with time, knowledge, authority, and passion are needed to implement, adjust, and sustain an organizational accessibility program.

8.11.2 Actions include:

8.11.2.1 Establish organizational digital accessibility champion(s).

8.11.2.2 Empower champion(s) to communicate with key stakeholders, to provide awareness, to provide direction, and to suggest changes.

8.12 **Strategy 6** – Integrate digital accessibility into project communication and marketing efforts for new or updated digital information and services.

8.12.1 By insuring that project communication and project marketing materials are delivered in an accessible manner, greater inclusiveness is achieved.

8.12.2 Actions include:

8.12.2.1 Identify resources to serve as digital accessibility guidelines and standards for project communication and marketing materials.

8.12.2.2 Establish communication channels and/or repositories for individuals to access this information from.

8.13 **Strategy 7** – Harmonize digital accessibility policy and standards to the current, pertinent, federal and state regulatory requirements.

8.13.1 Aligning our policy and standards to applicable regulatory requirements, provides consistency and strengthens our compliance efforts and provide extra credibility (overarching instead of Maine-specific).

8.13.2 Actions include:

8.13.2.1 Review accessibility policy and standards annually, implement updates, as required, following the established policy workflow.

8.13.2.2 Implement special policy and standard updates, as required, following the established policy workflow.

8.14 **Strategy 8** – Develop a strategic partnership with *agencies*, and other key stakeholders, to help ensure regulatory compliance.

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8.14.1 By treating digital accessibility as a strategic partnership, we better achieve regulatory compliance, by providing required documentation (remediation plans, etc.) and by more effectively managing the complaint and dispute resolution process.

8.14.2 Actions include:

8.14.2.1 Implement an overarching organizational digital accessibility strategic plan (this document).

8.14.2.2 Identify strategic partners within the organization for this collective effort, including their roles and responsibilities.

8.14.2.3 Collaborate with these partners to document regulatory requirements, associated filing frequency, and deadlines, and procedures to handle complaints and dispute resolution.

8.14.2.4 Utilize the Information Technology Accessibility Committee (ITAC) as a digital accessibility advisory group.

8.14.2.5 Establish a Multi-State digital accessibility collaborative.

8.14.2.6 Explore, establish other partnerships (University System, etc.)

8.15 **Strategy 9** – Facilitate organizational digital accessibility coordination.

8.15.1 When relationships between organizational entities with an accessibility role are known and clearly defined, greater communication, coordination, and clarity, and improved consistency and timeliness can be achieved.

8.15.2 Actions include:

8.15.2.1 Define digital accessibility roles, relationships, and workflows between Agencies, ADA Coordinators, EEO Coordinators, Information Technology, etc.

8.15.2.2 Review the exception processes (waivers, etc.), updating and supplementing as necessary to reflect expanded coordination.

8.15.2.3 Establish communication methods and forums to help facilitate relationship building and coordination efforts.

8.16 **Strategy 10** – Build practices to update existing information and services for accessibility.

8.16.1 As part of the strategic partnership, an increased awareness of instances where inaccessible information and services exist, is necessary. This allows for better prioritization of remediation and replacement efforts.

8.16.2 Actions include:

8.16.2.1 Create a risk prioritization model.

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8.16.2.2 Develop a communication framework to provide awareness, guidance and feedback.

8.16.2.3 Identify key stakeholders, provide them with framework access.

8.16.2.4 Encourage greater participation in existing communication forums (webmaster, web coordinator, etc.)

8.17 **Strategy 11** - Incorporate necessary digital accessibility funding and resources into biennial budget requests.

8.17.1 Without sufficient funding and resources, digital accessibility program effectiveness is hampered. Organizations that commit necessary funding and resources, demonstrate dedication to ensuring digital accessibility.

8.17.2 Actions include:

8.17.2.1 Perform research and analysis to determine and justify required resources (personnel, products, training, etc.)

8.17.2.2 Request funding for required digital accessibility resources as part of the standard biennial budget process.

8.18 **Strategy 12** – Secure and sustain required digital accessibility resources.

8.18.1 Budget requests require approval, to be incorporated into the actual budget. Once the budget is established, additional steps are required to obtain and sustain the defined, approved resources.

8.18.2 Actions include:

8.18.2.1 Secure funding approval for required accessibility resources.

8.18.2.2 Acquire new (those that do not already exist) approved digital accessibility personnel resources.

8.18.2.3 Acquire new (those that do not already exist) approved digital accessibility non-personnel resources.

8.18.2.4 Establish memberships in recognized organizations, such as the International Association of Accessibility Professionals (IAAP).

8.19 **Strategy 13** – Define and include digital accessibility in the software development lifecycle.

8.19.1 Incorporating digital accessibility at the onset of, and throughout design and development efforts (new software or updates to existing software), rather than as a separate deployment-related activity, represents a shift to a more proactive organizational approach to digital accessibility.

8.19.2 Actions include:

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8.19.2.1 Develop guidelines for up-front, and continued incorporation of digital accessibility through the software development lifecycle.

8.19.2.2 Secure critical resources (tools, training, etc.) for developers to utilize to incorporate digital accessibility into their deliverables.

8.20 **Strategy 14** – Secure enterprise-level accessibility testing and validation tools.

8.20.1 A consistent, unified approach provides structure, accountability, and continuity to the digital accessibility testing process.

8.20.2 Actions include:

8.20.2.1 Define organizational testing needs and tester user-base and researching tools with capabilities that meet those needs.

8.20.2.2 Procure tools that meet the defined needs.

8.21 **Strategy 15** - Enable designated individuals and groups to utilize enterprise-level tools, once implemented.

8.21.1 Proper tool usage will help ensure effectiveness and consistency.

8.21.2 Actions include:

8.21.2.1 Create individual tester and developer group testing protocols.

8.21.2.2 Document the relationship to the overarching accessibility team testing protocols used for the final accessibility determination.

8.22 **Strategy 16** – Construct enterprise-level standards and procedures regarding documenting, storage, and retention of testing results.

8.22.1 Consistency in the documentation format, storage, and retention, will allow for greater location and retrieval and help assure compliance with any applicable security and retention requirements.

8.22.2 Actions include:

8.22.2.1 Create a common, enterprise-wide testing result template.

8.22.2.2 Identify and communicate testing result content expectations. For example, considerations regarding the usage of Personally Identifiable Information (PII) or other sensitive content.

8.22.2.3 Form storage and retention guidelines for testing results.

8.22.2.4 Establish security access controls for stored testing results.

8.23 **Strategy 17** – Advise users regarding products and practices to create accessible documents.



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8.23.1 Users who create formal internal communication, marketing materials, and training/support documentation benefit by utilizing products and practices that facilitate digital accessibility up-front. When this does not occur, re-work often needs to take place to make documents accessible.

8.23.2 Actions include:

8.23.2.1 Provide guidance regarding products to utilize to create accessible documents.

8.23.2.2 Furnish guidance and resources to make documents, marketing and training materials (web content, presentations, videos, etc.), and system documentation accessible.

8.24 **Strategy 18** – Ensure relevant digital accessibility requirements language is included organizationally in all vendor solicitations and procurements.

8.24.1 Consistent, clear expectations are key to ensuring that procured products and services are accessible. Vendors who incorporate accessibility into current products, integrate accessibility into daily operations, and have internal processes to improve accessibility demonstrate maturity.

8.24.2 Actions include:

8.24.2.1 Leverage existing nationally and internationally recognized digital accessibility templates, tools, and best practices, to the extent possible, into our vendor requirements.

8.24.2.2 Institute and maintain up-to-date accessibility requirements for Requests for Proposals (RFPs) and other vendor solicitations.

8.24.2.3 Institute and maintain up-to-date accessibility requirements for vendor contracts and other vendor procurement instruments.

8.24.2.4 Ensure contract renewals reflect the current, relevant digital accessibility requirements, prior to approval.

8.24.2.5 Provide project managers with awareness and resources to proactively incorporate digital accessibility into project efforts.

8.25 **Strategy 19** - Insure that appropriate plans exist to remediate issues and to provide equally effective alternative access for issues that are not yet remediated, for procured products and services.

8.25.1 When issues are encountered, having clearly defined plans in place to provide equally effective alternative access and/or remediation are critical. This helps address issues in a timely manner and helps identify consequences if issues are not addressed.

8.25.2 Actions include:

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8.25.2.1 Provide a mechanism to identify and document options and associated timelines to remediate known issues.

8.25.2.2 Provide a method to identify and document equally effective alternative access plans, if accessibility issues are encountered.

8.26 **Strategy 20** – Deploy a clear, well-defined, ongoing digital accessibility training program.

8.26.1 When a training plan and course curriculum exists for personnel, that is applicable to their assigned organizational role(s), it facilitates the development of competencies in digital accessibility.

8.26.2 Actions include:

8.26.2.1 Develop general digital accessibility, and supplemental role-based training requirements, in collaboration with human resources.

8.26.2.2 Develop accessibility skills requirements, to be included in recruitment efforts, for positions with digital accessibility roles.

8.26.2.3 Incorporate digital accessibility awareness, into the standard training for new employees and new managers.

8.26.2.4 Ensure the delivery of ongoing training to meet defined training needs (general and supplemental).

8.26.2.5 Adopt a consistent methodology to track training records.

### 9.0 Document History and Distribution:

Version	Revision Log	Date
<i>Version 1.0</i>	<i>Initial Publication</i>	<i>October 1, 2020</i>

Approved by: Chief Information Officer

Legal Citation: [Title 5, Chapter 163: Office of Information Technology](#)<sup>6</sup>.

### 10.0 Definitions:

10.1 **Agencies:** Executive branch, or other organizational entities, established to provide specific services, that are within the Chief Information Officer realm.

10.2 **Americans with Disabilities Act (ADA):** A civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places open to the public.

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<sup>6</sup> <http://legislature.maine.gov/statutes/5/title5ch163sec0.html>

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- 10.3 **Artifacts:** Policies, standards, procedures, and/or guidelines, that are developed and utilized for digital accessibility program governance, risk management, and compliance.
- 10.4 **Digital accessibility:** An inclusive practice to ensure that no barriers exist to individuals, including those with disabilities, interacting with or accessing information and services delivered to end-users via technology.
- 10.5 **Digital information and services:** Delivered to end-users via data, voice, or video technologies.
  - 10.5.1 **Electronic content:** This includes, but is not limited to Websites and web-based materials (Internet & Intranet), Microsoft Office & PDF documents, training materials (e.g., online training materials, tests, online surveys), multimedia (video/audio), digital materials (e.g., documents, templates, forms, reports, surveys), maps and infographics, electronic emergency notifications, and subscription services (e.g., news feeds, alert services, professional journals);
  - 10.5.2 **Software:** This includes, but is not limited to web, desktop, server, and mobile client applications, authoring tools, associated infrastructure, and service offerings (Software as a Service (SaaS), Platform as a Service (PaaS), Infrastructure as a Service (IaaS));
  - 10.5.3 **Hardware:** This includes, but is not limited to computers & laptops, servers, tablets, printers and copiers, scanners, peripheral equipment (e.g., keyboards, mice), kiosks and mobile phones; and
  - 10.5.4 **Support documentation and services:** This includes, but is not limited to training services, help desk or call center, automated self-service & technical support, and product materials.
- 10.6 **Organizational:** Includes both Maine Information Technology and State of Maine Executive Branch agencies. This is an essential distinction, as a successful digital accessibility program requires a true partnership between these organizational entities.

## Appendix A – Relationships - Goals, Objectives, Strategies, and Dimensions

Goal	Description	Associated Objectives	Associated Strategies	DAMM
1	Implement a digital accessibility governance, risk management, and compliance framework.	<ul style="list-style-type: none"> <li>• Affirm leadership commitment.</li> <li>• Solidify compliance, risk management, and governance ownership.</li> <li>• Reduce risk from inaccessible information and services.</li> <li>• Transition to a proactive risk management strategy.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Strategy 1</b> – Establish governance, risk management, and compliance expectations.</li> <li>• <b>Strategy 2</b> – Communicate governance, risk management, and compliance expectations.</li> <li>• <b>Strategy 3</b> – Sustain the governance, compliance, and risk management program.</li> </ul>	<a href="#">DIM 1</a>
2	Cultivate a digital accessibility organizational culture through internal and external communication activities.	<ul style="list-style-type: none"> <li>• Increase internal and external awareness and outreach.</li> <li>• Improve organizational access to resources and tools.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Strategy 4</b> – Promote digital accessibility throughout the organization.</li> <li>• <b>Strategy 5</b> – Form digital accessibility leadership roles.</li> <li>• <b>Strategy 6</b> – Integrate digital accessibility into project communication and marketing.</li> </ul>	<a href="#">DIM 2</a>
3	Maintain up-to-date digital accessibility policies and standards.	<ul style="list-style-type: none"> <li>• Increase policy and standard update frequency.</li> <li>• Expand communication of policies and standards.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Strategy 7</b> – Harmonize policy and standards to current, pertinent, federal and state regulatory requirements.</li> </ul>	<a href="#">DIM 3</a>
4	Foster strategic digital accessibility partnerships, in support of organizational regulatory processes.	<ul style="list-style-type: none"> <li>• Expand agency partner outreach.</li> <li>• Increase collaboration with State ADA and EEO Coordinators.</li> <li>• Extend utilization of the advisory I.T. Accessibility Committee (ITAC).</li> <li>• Improve utilization of forums (e.g. web coordinators, webmasters).</li> <li>• Collaborate with other states and groups (University System, etc.).</li> <li>• Build an increased organizational awareness of existing issues and the importance of addressing.</li> <li>• Enhance conformance, compliance, and corrective action plan reporting.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Strategy 8</b> – Develop a strategic partnership with <i>agencies</i>, and other key stakeholders, to help ensure regulatory compliance.</li> <li>• <b>Strategy 9</b> – Facilitate digital accessibility coordination across the organization.</li> <li>• <b>Strategy 10</b> – Build practices to update existing information and services for accessibility.</li> </ul>	<a href="#">DIM 4</a>
5	Insure funding, resources, and fiscal management to support defined	<ul style="list-style-type: none"> <li>• Amass quantitative information to justify the business case for digital accessibility program efforts.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Strategy 11</b> - Incorporate digital accessibility funding into biennial budget requests.</li> </ul>	<a href="#">DIM 5</a>

## Digital Accessibility Strategic Plan

Goal	Description	Associated Objectives	Associated Strategies	DAMM
	digital accessibility program efforts.	<ul style="list-style-type: none"> <li>Establish a long-term funding approach, to ensure continued strategic viability.</li> </ul>	<ul style="list-style-type: none"> <li><b>Strategy 12</b> – Secure and sustain required digital accessibility resources.</li> </ul>	
6	Incorporate digital accessibility organizationally into all development lifecycle stages.	<ul style="list-style-type: none"> <li>Incorporate accessibility practices as a core design component.</li> <li>Add development process digital accessibility roles/responsibilities.</li> <li>Improve workflows and planning to better implement accessibility into the development lifecycle.</li> <li>Enhance digital accessibility knowledge of developers.</li> </ul>	<ul style="list-style-type: none"> <li><b>Strategy 13</b> – Define and include digital accessibility in the software development lifecycle.</li> </ul>	<a href="#">DIM 6</a>
7	Build a consistent, enterprise-approach to accessibility testing.	<ul style="list-style-type: none"> <li>Strengthen quality assurance by testing for, and tracking, accessibility issues within code.</li> <li>Grow testing consistency for project and development efforts.</li> <li>Increase alignment globally recognized testing standards.</li> <li>Improve reporting completeness, consistency, and understanding.</li> <li>Incorporate user/usability testing.</li> </ul>	<ul style="list-style-type: none"> <li><b>Strategy 14</b> – Secure enterprise-level accessibility testing and validation tools.</li> <li><b>Strategy 15</b> - Enable designated individuals to utilize enterprise-level tools, once implemented.</li> <li><b>Strategy 16</b> – Construct standards and procedures for documenting, storing, and retaining testing results.</li> </ul>	<a href="#">DIM 7</a>
8	Construct a support model, and accessible documentation, to meet the communication needs of users with disabilities.	<ul style="list-style-type: none"> <li>Augment infrastructure for greater digital accessibility documentation, support, and tracking.</li> <li>Build measurable metrics to demonstrate progress made.</li> </ul>	<ul style="list-style-type: none"> <li><b>Strategy 17</b> – Advise users regarding products and practices to create accessible documents.</li> </ul>	<a href="#">DIM 8</a>
9	Integrate digital accessibility into procurement and vendor management activities.	<ul style="list-style-type: none"> <li>Extend the procurement development, evaluation, and review processes to factor in digital accessibility compliance.</li> <li>Improve the effectiveness of addressing non-compliance and escalation of digital accessibility procurement issues.</li> </ul>	<ul style="list-style-type: none"> <li><b>Strategy 18</b> – Ensure that relevant digital accessibility requirements are included in all solicitations and procurements.</li> <li><b>Strategy 19</b> - Insure appropriate plans exist to remediate issues and to provide equally effective alternative access, for procured products and services.</li> </ul>	<a href="#">DIM 9</a>
10	Promote and ensure delivery of	<ul style="list-style-type: none"> <li>Boost organizational digital accessibility awareness.</li> </ul>	<ul style="list-style-type: none"> <li><b>Strategy 20</b> – Deploy a clear, well-defined, ongoing digital accessibility training program.</li> </ul>	<a href="#">DIM 10</a>

## Digital Accessibility Strategic Plan

Goal	Description	Associated Objectives	Associated Strategies	DAMM
	digital accessibility training.	<ul style="list-style-type: none"><li>Expand appropriate role-based digital accessibility training.</li></ul>		