



SIPA ANNUAL USER CONFERENCE 2024

# A strategic start to accessibility



**COLORADO**  
Energy & Carbon Management  
Commission  
Department of Natural Resources



# About ECMC

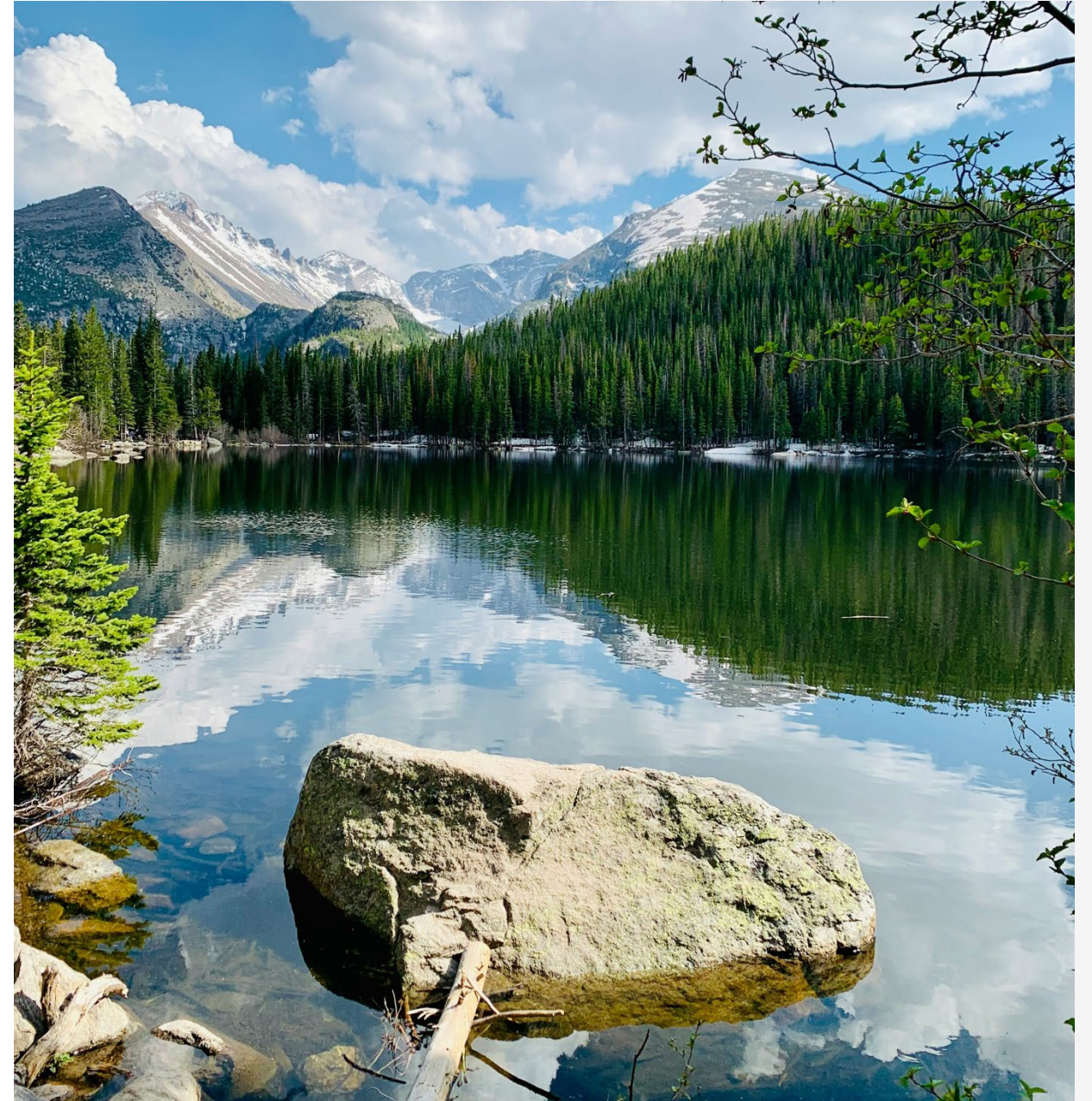
The Colorado Energy and Carbon Management Commission (ECMC) is a division of the Colorado Department of Natural Resources.

Our mission is to regulate the development and production of oil and gas, deep geothermal resources, the capture and sequestration of carbon, and the underground storage of natural gas in a manner that protects public health, safety, welfare, the environment and wildlife resources.



**Paige Pappianne**

Deputy Director, Strategic Services  
CO Department Of Natural Resources



# About CapTech

CapTech is a technology consulting firm that partners with state and local governments to drive innovation and produce positive impact for citizens across a wide range of service offerings.

Our teams include accessibility experts certified through the IAAP (International Association of Accessibility Professionals). We provide accessibility strategy and training, perform audits and remediation, and deliver custom design and development that meets and exceeds accessibility standards.



**Coe Sherrard**  
Managing Director, Public Services



**Matt Leahy, CPWA**  
Associate Director, Customer Experience



## CUSTOMER EXPERIENCE

- Customer Insights
- Brand Storytelling
- Experience Design
- Accessibility
- Product
- Data Visualization



## SYSTEMS INTEGRATION

- Mobile Innovation
- Services and API
- Cloud Systems
- Continuous Delivery
- Web Capabilities
- Accessibility
- Salesforce



## DATA + ANALYTICS

- Data Strategy
- Data Visualization
- Data Engineering
- Advanced Analytics
- Cloud Systems



## MANAGEMENT CONSULTING

- Agile
- Program Leadership
- Functional Expertise
- Change Acceleration
- Salesforce
- Workday
- Product

# Contents

- Getting started
- Current state assessment
- Strategic roadmap
- Looking ahead

# Getting started



# My journey with ECMC

- Created internal accessibility committee
- ↓
- Worked with SIPA
- ↓
- Created an accessibility plan
- ↓
- Selected CapTech as accessibility partner



# Engagement with CapTech

Our accessibility plan defined steps to understand our current state and prepare our team to work towards accessibility remediation.

As we began to move forward and look for an accessibility partner, SIPA connected us with CapTech.



Internal ECMC comms to stress the importance of accessibility for EDI (equity, diversity, and inclusion)



1st CapTech engagement:  
Current state assessment and roadmap



Internal ECMC decision-making based on assessment findings and recommendations



2nd CapTech engagement:  
Remediation of customer-facing interfaces



ECMC training and capacity-building

# Current state assessment

## Findings Summary

Reviewed content does not meet WCAG 2.1 AA standards.

[View the Full Report](#)

214 issues

Priority:

Effort: 1

Critical

Users are  
some of

1. eForm
2. Comp
3. Heari
4. Heari
5. Form
6. GIS C

10 | Copyright

### FINDINGS

## ECMC Global Issues

38

Issues L

### HIGH

- Col
- Link
- Vag
- Tex
- Hea
- Foc
- read

12 | Copyright

### FINDINGS

## PDF Documents

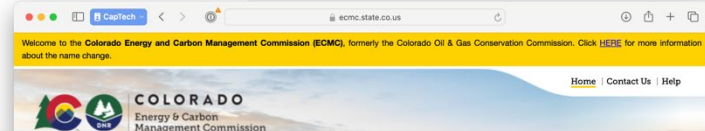
08

Average issues per document

### HIGHLIGHTS

- Reading order is inconsistent and unpredictable due to a lack of tagging
- Headings are not specified
- Document titles & language are missing
- Character encoding is not used
- Some documents are unreadable using a screen reader

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Click here to reset form

FORM 28 New Issue

State of Colorado  
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303) 894-2100 Fax: (303) 894-2109

**CENTRALIZED E&P WASTE MANAGEMENT FACILITY PERMIT**

Submit this Form and accompanying documents for each facility per Rule 908. Financial Assurance in the amount of \$50,000 is required to operate each facility.

Surety ID: \_\_\_\_\_

Complete the Attachment Checklist		
	Op	ECMC
Site description (flow, geol, hydro)		
Adjacent land use description		
Topographic map		
Site drainage map with structures		
Scaled drawing and survey map		
Facility design & engineering		
Operating plan		
Water analysis report		
Financial assurance		
Closure plan		
Local gov't zoning compliance		
Local gov't permits and notice		

1. Is the site in a sensitive area?  Y  N

2. What are the average annual precipitation and evaporation rates for the site?  
Precipitation: \_\_\_\_\_ inches/year Evaporation: \_\_\_\_\_ inches/year

3. Has a description of the site's general topography, geology and hydrology been attached?  Y  N

4. Has a description of the adjacent land use been attached?  Y  N

5. Has a 1:24,000 topographic map showing the site location been attached?  Y  N

6. Has a site plan showing drainage patterns, diversion or containment structures, roads, fencing, tanks, pits, buildings and any other pertinent construction details been attached?  Y  N

7. If site is not owned by the operator, is written authorization of the surface owner attached?  Y  N

8. Has a scaled drawing and survey showing the entire section(s) containing the proposed facility been attached?  Y  N

9. What measures have been implemented to limit access to the facility by wildlife, domestic animals or by members of the public? Briefly explain.



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CapTech.



# The project at a glance

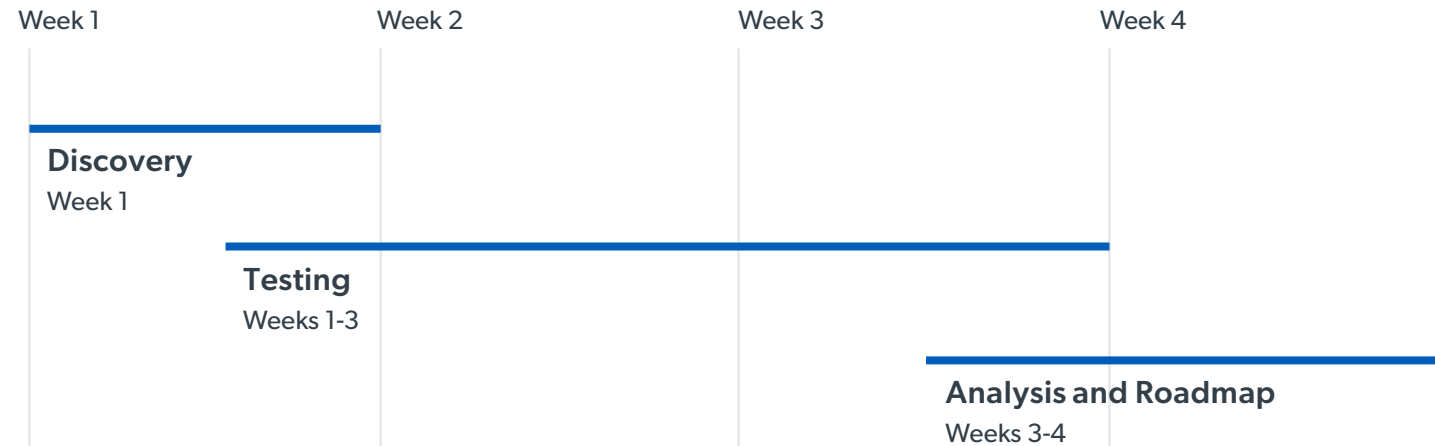
ECMC and CapTech targeted a short timeline designed to rapidly generate actionable insights and recommendations.

**TIMELINE**  
4 weeks




**SCOPE**  
45 webpages and documents

**TEAM**  
1 Project Manager + 1 Accessibility SME + 1 Accessibility Analyst

## Timeline



## Deliverables

-  Accessibility report
-  Issue log
-  Strategic roadmap

# Understanding current state

To provide the greatest value in the shortest period of time, CapTech conducted a streamlined testing approach:

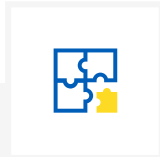
- Tested a representative sampling that covers all digital properties and all major content and functionality, including documents and third-party tools
- Performed automated scans and targeted manual testing (keyboard testing, screen reader testing, etc.)
- Focused testing and documentation on critical access barriers and automatically detectable issues

## Why this approach?

1. Improve the user experience and reduce the likelihood of accessibility claims against ECMC.
2. Quickly identify immediate priorities for full evaluation and remediation.
3. The new ECMC site is launching this year — a full remediation of the current site is not an effective use of time and resources.

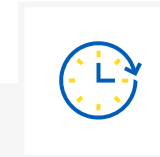
# Assessing our findings

Following initial testing and working with some ECMC team members to better understand the environment, we started drafting our recommended approach to tackling accessibility. We built out a comprehensive and actionable roadmap, meeting ECMC where they were.



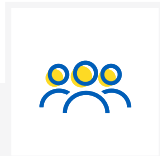
## What needs to be done?

A clear and complete view of all steps that would be necessary to remediate ECMC digital properties and establish a solid foundation for maintaining accessibility



## What needs to be done *first*?

A framework for prioritizing which steps need to be addressed first to minimize risk or lay the groundwork for other measures that can be completed later on



## Who is responsible?

A delineation of which parties are best positioned to execute on each step in the roadmap and what additional support will be needed along the way



## What will it take?

An understanding of the level of effort and dependencies involved in completing each step recommended in the roadmap

# Prioritizing remediation

When prioritizing which accessibility issues to address most urgently, we consider several factors that influence risk, impact to users, and the remediation process.

## WCAG violations

Clear WCAG violations represent higher risk and must be addressed, starting with level A and followed by AA violations.

## + Issue severity

Issues that fully prevent access for certain users should be prioritized over issues that can be worked around or have lesser impact.

## + Scope

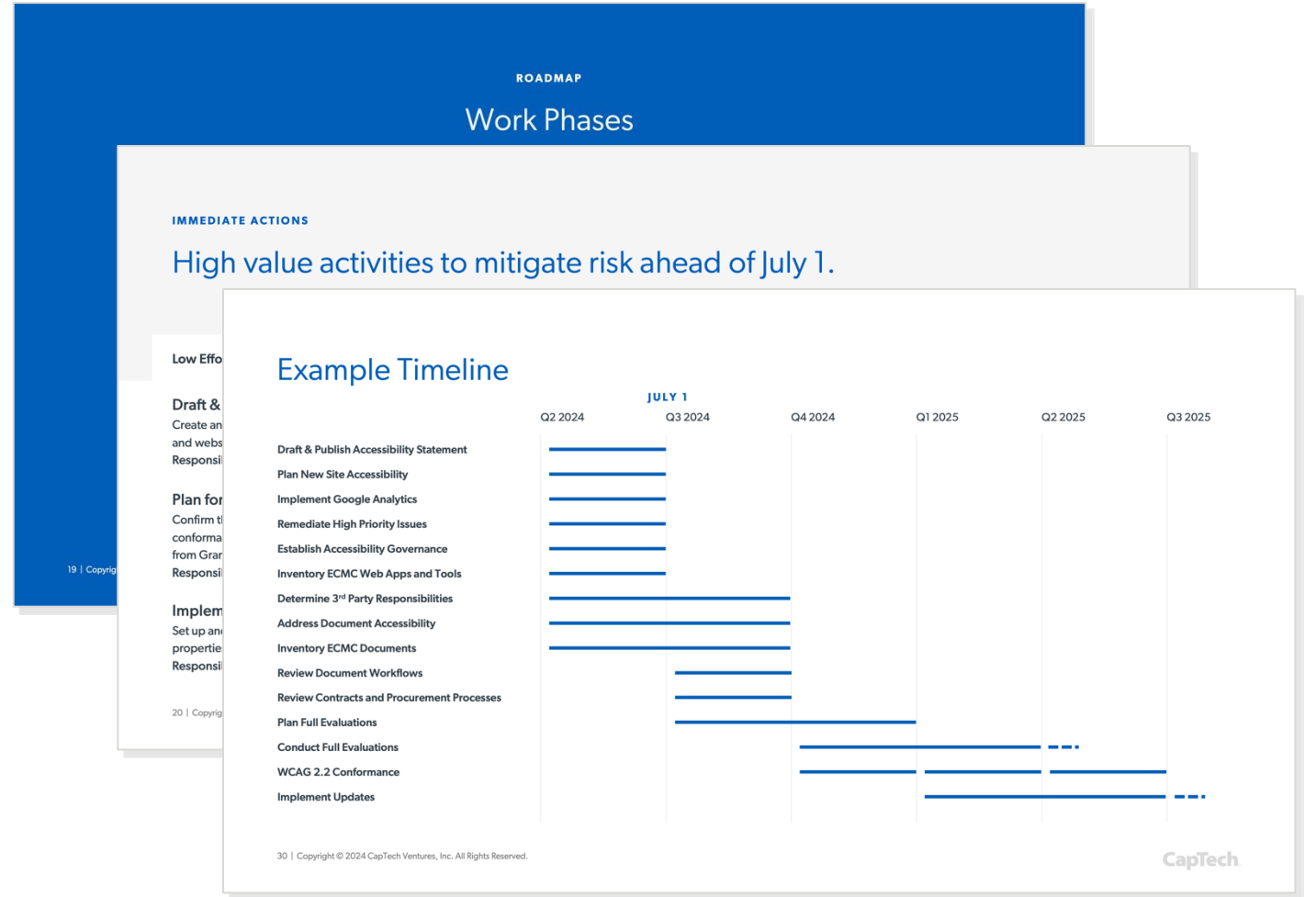
Issues that impact global elements, essential functionality, or high traffic areas will have the greatest impact on users.

## + Level of effort

The difficulty to remediate issues can vary widely. After impact and scope, the level of effort can be used to further weight prioritization.

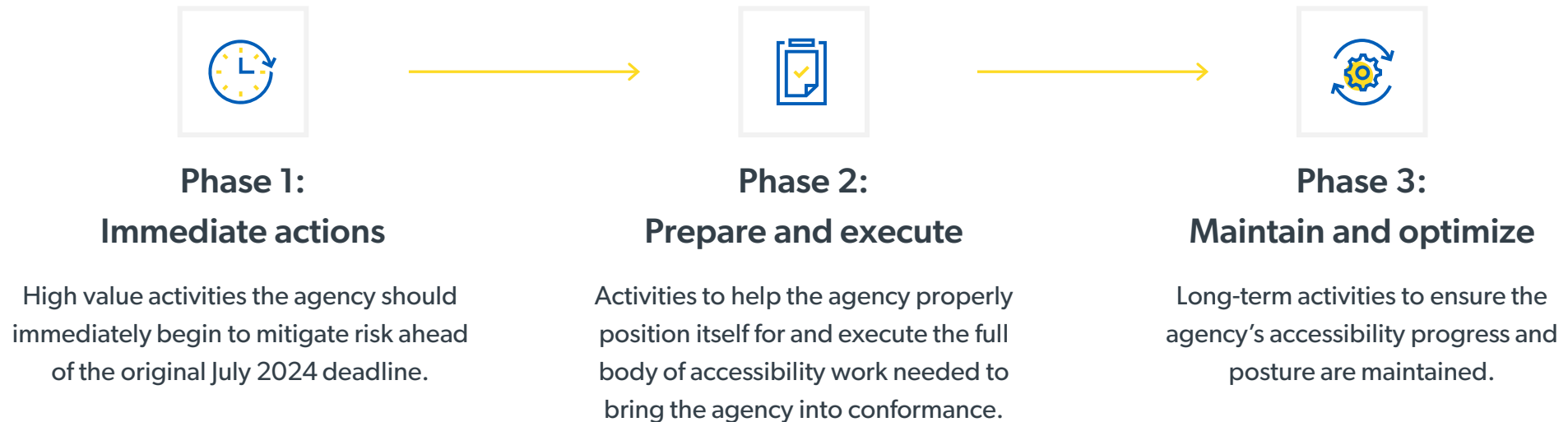
**WCAG:** The [Web Content Accessibility Guidelines](#) are the international set of standards for web accessibility published by the W3C (World Wide Web Consortium). Almost all web accessibility litigation relies on WCAG to gauge accessibility conformance.

# Strategic roadmap



# Pursuing accessibility in phases

We broke our roadmap into three sections, with each of our recommended activities prioritized based on risk and level of effort:



# Phase 1: Immediate actions

The top priorities in the roadmap focused on mitigating risk ahead of the original July 1, 2024 deadline and laying important groundwork to facilitate the next steps to follow.

## Low Effort

**Draft and publish an accessibility statement**

Responsible Party: ECMC

**Define accessibility standards and test plan for new website (in development)**

Responsible Party: ECMC + development partner

**Implement Google Analytics to enable prioritization for future accessibility work**

Responsible: ECMC + analytics vendor

## Medium Effort

**Remediate high priority issues identified during assessment**

Responsible Party: ECMC + accessibility partner

**Determine accessibility conformance and commitments from 3<sup>rd</sup> party platforms**

Responsible Party: ECMC

**Establish ownership and governance for accessibility within ECMC**

Responsible: ECMC

## High Effort

**Remediate document source files and draft language for requesting existing documents in accessible formats**

Responsible Party: ECMC + accessibility partner

## Phase 2: Prepare and execute

Next, the roadmap outlined all of the remaining activities necessary to achieve conformance with accessibility standards now and going forward.

### Low Effort

**Create a full inventory of ECMC websites and applications**

Responsible Party: ECMC

**Prioritize and plan full accessibility audits, incorporating WCAG 2.2 criteria**

Responsible: ECMC + accessibility partner

### Medium Effort

**Review document creation workflows to identify accessibility gaps**

Responsible Party: ECMC + accessibility partner

**Review contract and procurement process for accessibility considerations**

Responsible Party: ECMC

### High Effort

**Create a full inventory of all ECMC documents**

Responsible Party: ECMC

**Conduct full accessibility audits of all digital properties**

Responsible Party: ECMC + accessibility partner

**Implement new processes for content authoring, document creation, and procurement.**

Responsible Party: ECMC + accessibility partner



## Phase 3: Maintain and optimize

Accessibility is not a one-and-done effort. Content will be updated, new contributors will be hired, and technology and standards will evolve. To ensure that conformance is not lost over time, CapTech's roadmap for ECMC outlined recommendations for regularly monitoring accessibility and embedding it into training and processes.

- Establish roles and procedures for managing accessibility
- Continue to optimize accessibility tools, training, and support provided to designers, developers, and content authors
- Implement regular cadences for accessibility review
- Evaluate and update hiring and onboarding materials to ensure accessibility is represented
- Regularly update accessibility statement
- Communicate with software vendors about accessibility defects
- Address the accessibility of internal tools and content
- Monitor organizational accessibility maturity

# Looking ahead





## Moving forward with clarity and purpose

ECMC aims to meet all accessibility standards and legal requirements by 2026.

- Continue to work toward milestones in strategic roadmap.
- Utilize partnership with CapTech to build internal accessibility expertise and capabilities.
- Leverage relationship with SIPA for future accessibility needs.

THANK YOU



Questions?



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