
DSPD WEBSITE ADMINISTRATION

Accessibility, Navigability, and User Experience

Directive 1.59

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Purpose:

To establish policy and procedures for administration of the DSPD website that ensure standards of accessibility, navigability, and user experience (UX); and to further ensure compliance with DHHS policies, divisional goals, and state and federal requirements.

Definitions:

Accessibility – means that a person with a disability is able to access and use the content on the DSPD website. They are able to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use.

Accessibility remediation – means the process and techniques use to ensure that a document meets WCAG 2.2 standards before publishing on the website. Website administration team members will receive training to perform this process, which includes use of accessibility checking tools and adding or fixing errors that are detected.

Compliance – as used here refers to meeting the minimum standard. For example, compliance with WCAG 2.2 AA means that the minimum specifications of that standard have been met.

Content/Content Creator/Content Approver – Content includes all public-facing written, visual, or audible materials on the DHHS DSPD website. A content creator is a DHHS staff member, contractor, or vendor who creates content on behalf of DHHS. A content approver means someone who has the authority to allow or stop the dissemination of a document or page on the website. This includes the division’s PIO, the website coordinator, and in some situations (as outlined in this directive) may additionally include members of the division leadership, or EDO.

Navigability – means the way that a user engages with the DSPD website, and the content on that site. It includes the manner in which the site may be accessed and the navigation interfaces required to find and retrieve information from the site.

Public Information Office (PIO) – a member of the Public Affairs and Education (PAE) team at DHHS that is assigned to DSPD for ensuring department communications standards.

User Experience (UX) – means the overall experience of a person using the DSPD website and its content. It includes the experience of a diverse group of users and how easy or hard it is for them individually to navigate the site and find what they need. UX standards account for a range of experiences from pleasing to frustrating and acknowledge that there are many types of users who may have different experiences.

Web Content Accessibility Guidelines (WCAG) – refers to an internationally recognized set of guidelines for making a website accessible. There are four main guiding principles of accessibility upon which WCAG has been built. These four principles are known by the acronym POUR for perceivable, operable, understandable and robust.

Website Administration Team (the “Team”) – means a committee responsible for jointly and cooperatively administering the DSPD website, its content, and ensuring policies related to the website. The team meets approximately monthly and is responsible for ensuring compliance with division, department, state and federal policies and goals. It includes the website coordinator, the DSPD PIO, and then other division staff as assigned by division leadership.

Website Coordinator – means a DSPD staff assigned the responsibility of managing the website and its administration in coordination with division leadership, the website administration team, and the website workgroup.

Well-Structured – when applied to a website means that the website facilitates easy navigation, enhances user experience, and enables effective indexing of the site for search engines. There is a clear hierarchy of information. This, in turn, can improve the site’s performance by making it easier for users to find and engage with the content. When applied to a document or presentation it means that a tagged reading order and headings provide a logical and navigable hierarchy that allows users to jump between sections. By using proper heading levels, content creators enable screen reader users to navigate directly to specific content areas, saving time and effort.

World Wide Web Consortium (W3C) – is an international public-interest non-profit organization that develops web standards. It is the main international standards organization for the internet. The Web Accessibility Initiative (WAI) of W3C is responsible for establishing and updating WCAG standards.

I. Policies:

1. The DSPD website is the division’s most readily available and public-facing source of information regarding services and their administration, and for communicating important information about division policies and actions. It is targeted to diverse audiences that include: persons or families who are receiving DSPD services or who are interested in receiving services; DSPD’s contracted providers, including external support coordinators; DSPD staff; community and agency partners; legislators; other members of the public at large. DSPD is committed to maintaining the accuracy of the information on the site to ensure that it is up to date and usable by all the audiences for whom it is intended. To that end, DSPD is also committed to maintaining high standards of accessibility, navigability, and user experience (UX). This policy further ensures compliance with DHHS policies including but not limited to 06-03, 06-04, and 06-05, and to divisional goals and state and federal requirements.
2. **Accessibility:** To maintain and ensure the accessibility of the DSPD website, the site and its contents will conform to the standards and guidelines that were established by the World Wide Web Consortium (W3C) in the Web Content Accessibility Guidelines (WCAG) version 2.2. Using WCAG 2.2 guidelines, DSPD has committed to a minimum standard of AA conformance, and to meeting AAA conformance wherever possible.
3. **Navigability and User Experience (UX):** DSPD is committed to making the contents of the website consistent and user-friendly by adhering to plain language standards wherever possible, and to creating a clean and consistent navigation interface and structure for the users who visit the site.
4. In order to be navigable, and to ensure good UX, the site will be well-structured and meet the following goals:

- a. **Content/Information Hierarchy** - this means arranging content on a page so that the most important information is first (on top), and that it is rendered cleanly and clearly without getting lost in an overly complex presentation, or in an overabundance of other content. On the site's overall design, this means that there is a coherent top-down navigation system to enable users to quickly find the content they are looking for without getting lost in other content or navigation tools. Documents, links, and pages must not be redundant. A single version of any page, document, or linked resource is sufficient. Limited exceptions will exist such as for division forms, which are used by multiple audiences but are all consolidated onto a single page. That page is therefore linked from the navigation menu of each of those audiences.
- b. **Navigability** - the overall organization of the site from the landing page to each subsequent child page, and then any/all navigation tools/menus should all be simple, concise, consistent, and descriptive. Avoid unnecessary clutter of content through duplication of items in the navigation structure, or placement of content that is not consistent with other content or structure in the information hierarchy.
- c. **Design conventions** - Use consistent design plans on the parallel parts of the site so that users know how to navigate the site easily based upon their prior experience with using the site. A unique design on only one page can pose significant problems for a user. Using one part of the site should inform the user and teach them how to use the rest of the site. Use of standard DHHS design templates will enable this consistency to a certain point, but a conscious effort must be made to ensure consistency in any new design or document.
- d. **Readability** - Staff will ensure consistency in the presentation, tone, and organization of content. The choice of content medium (text, image, video, etc.) will be thoughtfully paired to the particular audience (UX) for whom it is intended, and the purpose for which they will use the content. Text content should always meet the appropriate target audience's expectations for reading level. Technical materials for specific audiences may exceed a standard reading level, but only after careful review. Avoid clutter and let content breathe through a balance of content, style and functionality.
- e. **Visuals** - should be used to engage users, but should always comply with accessibility standards, including tagging images with alt-text for screen readers, and using a tagged reading order in all documents.
- f. **DHHS standards** - the site and its content should meet with DHHS Policy 06-05 "Content Creation and Review," including DHHS branding and style guidelines. This will be coordinated through the division's assigned Public Information Officer (PIO).
- g. **Responsiveness across devices.** Content and navigation should be able to re-flow responsively on common devices including desktops, laptops, tablets, and mobile phones.

II. Procedures.

1. Administration:

- a. The division director, in consultation with the division leadership team, will appoint a website coordinator and other members of the website administration team. Members will be added or replaced as necessary, without terms, and membership will be linked to job responsibilities.
- b. The website administration team will include the website coordinator, the division PIO, and other division staff as appointed.
- c. Administrative access to the DSPD website, which includes adding, editing, and maintaining content on the site, is limited to the website administration team, but may also include members of the division leadership team, *ex officio*.
- d. Members of the website administration team must complete minimum competency training in WCAG standards and on how to apply them; they will also maintain ongoing training for understanding of website navigability and UX.
 - i. WCAG training can be completed through WebAIM or a similar organization or method.
 - ii. The training must be sufficient in scope and depth that the team member can meet their responsibilities as described in this directive.

- iii. Understanding of UX and navigability may be maintained informally either through individual effort, or through additional discussions in the monthly meetings, or both.
- e. The website coordinator will schedule regular meetings that occur approximately monthly with the remaining members of the website administration team.
- f. The monthly meetings will be an opportunity for the team to discuss website planning and updates and also to educate each other on accessibility, navigability and UX, as these issues occur in the course of website planning.
- g. All new designs will be reviewed and discussed before being implemented on the website. Approval may be withheld by content approvers on the team, or referred for additional review by PAE or EDO.
 - i. Existing or new documents that require amendment or addition to the site but that already conform to existing design standards do not require review by the full team, but may be discussed as requested by members of the administration team, or by the division leadership team.
- h. All members of the website administration team are responsible for assuring compliance with DHHS policies and standards, and accessibility standards. Procedures for content creation, review, and approval will follow those set forth in DHHS 06-05. Members of the website administration team are also responsible for adherence to the principles of navigability, and UX. The following two roles implement policy described in 06-05 and elsewhere for **content approver**, and **content reviewer**.
 - i. The division assigned PIO will oversee compliance with DHHS policy and standards, where there are any questions.
 - ii. The website coordinator will oversee compliance with accessibility, navigability, and UX standards and principles, where there are any questions.

2. Proposing new content, or changes to content on the DSPD website:

- a. Any DSPD staff member may propose new content for the website, or a change to the existing content by contacting the website coordinator or another member of the website administration team. This is described as a content creator in 06-05.
- b. Decisions from DHHS leadership or state governmental leadership may also dictate the need for new content. The website coordinator will work with the website administration team to develop that content in consultation with DSPD leadership and other relevant staff.
- c. Any new or amended directives will follow the procedures outlined in Directive 1.24, "Internal Directive Development and Revision."
- d. Any new or amended division training will follow the procedures outlined in Directive 1.18 "Division Training."
- e. If the new content is of a type that is different from other existing content already on the site, or constitutes a significant change to the site, then it will be discussed and reviewed by the full website administration team for possible adoption.
- f. If the additional content is of a type that is already present on the website, and it will conform to the design of that other content, and it will be placed on the same page as that other content, then a full review is not needed. A member of the team may simply add the content after ensuring that it meets the standards in this directive.
- g. The PIO and website coordinator will consult with the division leadership team and EDO as needed whenever questions about new content arise and the team is unable to resolve the question internally.
- h. **Sensitive content** as defined in 06-05 requires EDO review and approval. This includes "content that may be culturally or politically sensitive and may include content: (i) related to controversial issues; (ii) about recent or pending high-profile or controversial legislation; (iii) related to topics that consistently in the news; (iv) with the potential to impact other agencies; and (v) developed for a national audience." (DHHS 06-05, II, T).

3. Accessibility:

- a. All documents and other content on the DSPD website must conform to WCAG 2.2 AA standards. Whenever it is possible, the content should meet AAA standards.

- b. Any member of the website administration team who is preparing content for publication will be responsible for assuring AA compliance.
- c. The team member will assure that DHHS brand colors are used exclusively, and that these are applied in such a way that at least AA contrasts are achieved per that standard.
 - i. Contrasts must be measured with a contrast checker tool and not simply estimated based upon personal subjective experience. A reliable contrast checker [is available from WebAIM](#), but others are also available.
 - ii. DHHS brand colors include available tints for each color, as described in [the DHHS color palette](#), and these may be used when necessary to increase contrast.
 - iii. Contrast is measured as a ratio between two adjacent colors:
 - 1. AAA - for normal sized text (11-12pt), the required ratio is 7:1;
 - 2. AA compliance requires at least 4.5:1 for normal text.
 - 3. AAA - for larger text (titles, or headers), and also for adjacent areas of a graphical object, 4.5:1 is the minimum ratio.
 - iv. AA compliance requires a minimum of 3:1 for larger text and graphical objects.
 - 1. Large text means 14pts or larger if bold, or 18pts or larger if regular weight.
- d. Documents published on the DSPD website will meet WCAG 2.2 AA standards, and AAA if possible:
 - i. An accessible pdf may be created in a number of different ways, including through export from another program like Word, or InDesign. Exporting the document does not in itself assure accessibility, and further steps may be required to check and remediate for accessibility:
 - 1. The pdf should be checked in Adobe Acrobat to assure accessibility by using the Accessibility Checker tool, and then reviewing the Accessibility Report.
 - 2. Accessibility issues that are revealed by this preceding step must then be resolved before publication. This is called *accessibility remediation* of the document.
 - ii. An accessible pdf is a well-structured pdf, and therefore it must contain a tag structure that is revealed in the “tags tree” of the document (available as a tool in Acrobat), so that a screen reader user may navigate the content successfully.
 - iii. Careful planning when creating and exporting the document to pdf will eliminate or at least reduce the amount of remediation that is required by creating a well-structured document from the start.
- e. Completion of accessibility training will allow members of the website administration team to learn how to both create well-structured documents and to remediate documents when necessary.
- f. When possible, a document may also be further tested by using a screen reader like JAWS or NVDA, but if the tester is not a native screen reader user, they must be conscious of the differences between their own UX, and that of a screen reader user. For example, screen reader users exclusively navigate screens with a keyboard, and so the tester must do the same and not allow themselves to navigate with a mouse or pointer since a screen reader user would not be able to navigate that way. Generally speaking, screen reader testing conducted by non-native users will have inherent limitations and these must be understood whenever testing by a native user is not possible.
- g. Documents should be posted as accessible pdfs, not as Word documents, which are more readily modified and edited by users, and are therefore less secure.
- h. All graphical images that appear in a document must either be marked with a meaningful alt-text tag, or else marked as “decorative” so that screen readers will skip over them, if appropriate.
- i. Using tables to structure content in a document requires special consideration for accessibility for screen readers. This is an advanced accessibility skill. It should be strictly avoided as a method for just organizing the layout on the screen.
 - i. Tabular data, on the other hand, may be rendered accessible by either rendering the data in a properly formatted table that a screen reader can navigate through, or else summarizing that data in the alt-text tag where feasible. Advanced training in accessible tables is required for the first option.

- j. All third-party content that is incorporated into the site must be reviewed and remediated for accessibility standards as described in this directive. (See 5, (g) and (h), below).
- k. Content that is of a presentation format will also meet WCAG standards. Accessibility training will identify similarities and differences between these and other documents and how to assure accessibility.
- l. Audio/Video (AV) content will meet the same DHHS branding and WCAG accessibility requirements as other documents.
 - i. Content with an audio component should be captioned;
 - ii. AV content will also allow sufficient opportunity for the user to pause and control the pacing of the content, and to back up to previous content as necessary.
- m. The website administration team will review content as needed during meetings and then arrive at strategies for meeting accessibility requirements where issues persist. These may include remediation or removal of inaccessible content.

4. **Navigability and User Experience:**

- a. Website administration team meetings will be led by the web-site coordinator; the team will review content and design plans together during meetings to achieve objectives of navigability and user experience.
- b. The coordinator and team will periodically receive training and informal input from the DTS UX team and other sources to assure that they are prepared to maintain the website within the principles of navigability and UX described in the Policy section of this document.
- c. A **website workgroup** may also be convened as necessary from within the broader ranks of DSPD staff and from our community partners.
 - i. The workgroup includes the members of the website administration team but also includes others; it is designed to gain input from more users of the website.
 - ii. There is no set meeting schedule for this work group, but meetings are scheduled by the coordinator and by mutual consent as necessary.
 - iii. Workgroup members represent their respective teams or constituencies at DSPD and serve as a means to collect input from a broader audience and to carry information back to those same groups.
 - iv. Participation in the work group is voluntary.
 - v. The work group will be convened and hold meetings when needed. For example, when there is a major redesign of the site that is being planned, or when some other questions arise that require broader input.
 - vi. Work group members provide valuable input about both the UX and navigability of the site beyond the perspectives of the team members, but they do not have administrative access to the site itself unless they are also team members, and they are not responsible for assuring that the site meets the terms of this directive.
 - vii. Work group members should nonetheless be familiar with this directive in order to provide effective input and to communicate website issues to their respective teams.

5. **Content and Content Creation:**

- a. As defined in DHHS 06-05, a content creator is a “DHHS staff member, contractor, or vendor who creates content.”
- b. Content will be reviewed by the website coordinator, division PIO, and website administration team to ensure compliance with this directive, and with departmental policy.
- c. Content that is published in Spanish requires review and approval by PAE Spanish-speaking PIOs;
 - i. The website administrative team will identify and recommend critical content for translation and review.
- d. All content that is retired and removed from the DSPD website will then be archived by the website administrator for archival purposes, and to fulfill future GRAMA requests. This is kept in a shared Google folder.

- e. All content posted on the DSPD website requires annual review under DHHS 06-05; this review is aside from the other regularly scheduled review of directives etc., and is to ensure that information is timely, accurate, and meets divisional and departmental objectives and policies.
- f. Given the vast amount of content that must be annually reviewed, all new content must be considered and reviewed for both need and added value. All new content must also be reviewed for the criteria laid out in DHHS 06-05 (IV)(a):
 - i. Does the content have a clear audience and communication goal?
 - ii. Does the content align with the department's vision and goals?
 - iii. Has more than one person reviewed the content?
 - iv. Has the content been reviewed by any relevant stakeholders?
 - v. Does content involve another OU's expertise?
 - vi. Has the data been checked by DSE or other data subject-matter experts?
 - vii. Has the content been checked for adherence to DHHS branding and writing style guidelines, as well as other related DHHS policies?
 - viii. Is the content considered sensitive material?
 - ix. Does the OU have a process to review current material?
 - x. Does the OU have a process to maintain an inventory of existing content, including websites?
- g. **External links** should be used sparingly and judiciously, and always require review and approval by the website administrator and division PIO.
 - i. Per DHHS 06-05, links to external websites must include the following disclaimer: "The Utah Department of Health and Human Services may occasionally link to outside sources of information. DHHS and the state of Utah do not necessarily endorse the provider of the content and are not responsible for any content published on the external site."
 - ii. External links will be consolidated and maintained in only a few areas of the website. Each of those areas will present the DHHS disclaimer followed by a list or menu system of links.
 - iii. External links will not be duplicated across the site, they will appear only once, in one of the consolidate areas marked as additional resources, and will appear with the disclaimer.
- h. **Other third-party content** incorporated into the website:
 - i. Per DHHS 06-05, content on the DSPD website should only be created by a DHHS staff member, contractor, or vendor. Therefore, third party content should not be added to the website without being incorporated into some new DHHS document or content that has been reviewed an approved, or through an external link with the DHHS disclaimer.
 - ii. New content will meet the requirements of this directive, including proper DHHS branding and standards. Proper attribution of the original (third-party) source material should be included, with the DHHS disclaimer, wherever necessary.
 - iii. Such content will always be reviewed by the website administrative team and approved by the website coordinator and division PIO.
 - iv. Any other third-party content that has not been re-branded as DHHS content will only be considered on an exceptional basis and will be reviewed on a case-by-case basis.
 - 1. The first review will be to make a recommendation by the website administrative team and must be approved by the website coordinator and division PIO.
 - 2. If recommended by the team, the next level of review and approval is by the DHHS Communications PAE Team. This is a further review beyond the division PIO's review.
 - 3. Additional review and approval by EDO may also be necessary in some instances.