3.1 Communications

Communications need to be accessible to the widest audience possible and meet the requirements in the accessibility standards. Accessible communications applies to all communications that are:

- external and internal
- formal and informal
- major and minor
- generated by the organization directly or by third parties under contract to the organization

Accessible communications is an umbrella term for clear, direct, and easy-to-understand communications that are renderable in multiple formats so that all users have equivalent access. It considers barriers to accessing information and removes them or provides alternatives.

3.1.1 How to Evaluate Communications' Maturity Level

- 1. Download the maturity model spreadsheet.
- 2. List all the organization's internal and external communication channels, such as email, video conferencing, or social media.
- 3. Compare the list to the spreadsheet to decide which proof points will be used to assess your organization's "Communications" accessibility maturity. Not all proof points will be used for every business or organization. The proof points in section 3.1.2 are non-exhaustive examples of criteria.

The level is **Inactive** when proof points demonstrate that::

• no effort has been made, or only isolated efforts have been identified.

The level is in **Launch** when proof points demonstrate that:

- some plans are in place to make internal and external communications accessible (and compliant with accessibility regulations, where applicable), but those plans haven't materialized into a cohesive roadmap
- plans are in place to provide training on accessible communications knowledge and skills relevant to each individual's position.

The level is in **Integrate** when proof points demonstrate that::

- an accessible communications roadmap has been developed
- some accessible communications have been delivered across internal and external media and platforms
- inaccessible communication tools are beginning to be replaced with accessible ones

- an accessibility policy includes requirements for a feedback system for users and a formal process for handling accessibility complaints
- training on accessible communications relevant to each individual's position has started.

The level is in **Optimize** when proof points demonstrate that::

- authoring, editing, and reviewing processes, procedures, and tools are in place, used consistently, and are regularly evaluated and refined to ensure that all internal and external communications are fully accessible
- accessible communications training relevant to each individual's position is required, measured, and monitored for improvement.

3.1.2 Proof Points

Communications <u>proof points</u> may include but are not limited to:

3.1.2.1 Foundation for accessible communication

- There are accessible corporate document templates (Microsoft Word, Microsoft PowerPoint, etc.).
- There are documented HTML or PDF conversion procedures to support accessibility features.
- Processes, procedures, and requirements for creating accessible communications are documented and available to employees
- Accessible collaboration tools are available (e.g., e-meeting, webinar, conferencing, chat)

3.1.2.2 Accessible Direct Communications

- Consistent use of accessible templates for:
 - o marketing and sales materials delivered in electronic formats
 - technical documents or position papers
 - product accessibility conformance reports (ACRs)
 - o other accessibility documentation
 - o presentations.
- Internal and external websites:
 - are accessible per regional regulatory requirements (e.g., conforms to WCAG)
 - may have an accessibility statement (a legal requirement for websites for public sector bodies in the European Union)
 - may contain a statement of commitment to accessibility.
- Products and services: accessibility compliance documentation is available and delivered in an accessible format (on the website, by request, or through the procurement process)
 - accessibility conformance reports (ACR)

- <u>accessibility statement</u> (a legal requirement for websites for public sector bodies in the European Union)
- o other accessibility-related documents, as identified
- multimedia, such as captions, transcripts, and described audio, if needed
- social media and blog content
- customer and vendor training
- information on <u>customer</u> support
- feedback mechanism for handling questions and accessibility complaints
- legal documents, payment, and billing
- other communications, as identified.

3.1.2.3 Accessible Communications Training

 Accessible communications training is in place to build and maintain relevant skills in support of this dimension's proof points

3.2 Knowledge and Skills

Internal and external personnel at all levels of an organization should have accessibility knowledge and skills relevant to their organizational role. Accessibility knowledge and skills relevant to each individual's position help employees understand their part in achieving the organization's accessibility goals.

While this dimension includes proof points to be implemented at the organization level, knowledge and skills specific to each of the other dimensions should be included within their respective proof points, as appropriate.

3.2.1 How to Evaluate Knowledge and Skills Maturity Level

- 1. Download the maturity model spreadsheet.
- 2. List all the organization's current "Knowledge and Skills" efforts.
- 3. Compare the list to the spreadsheet to decide which proof points will be used to assess your organization's "Knowledge and Skills" accessibility maturity. Not all proof points will be used for every business or organization. The proof points in section 3.2.2 are non-exhaustive examples of criteria.

The level is **Inactive** when proof points demonstrate that:

no effort has been made or only isolated efforts have been identified.

The level is in **Launch** when proof points demonstrate that:

- there are plans in place or initiated, but activities aren't well organized
- knowledge and skill areas are identified, and plans for organization-wide assessments to identify gaps are initiated but have not been completed

- some ad hoc training is provided, but professional development is not required or monitored
- requirements are defined for 3rd party learning tools and systems
- role-based training plans are under development
- accessibility training relevant to each individual's position has started.

The level is in **Integrate** when proof points demonstrate that:

- there's a workforce skills and training roadmap that includes:
 - o accessibility objectives for knowledge and skills assessments
 - o available training by role
 - o current information on learning technologies, platforms, and tools
- training is available to enhance knowledge and skills around ICT accessibility and disability inclusion
- training metrics are established.

The level is in **Optimize** when proof points demonstrate that:

- all personnel position descriptions, hiring announcements, and project management consistently communicate the required and preferred accessibility knowledge and skills
- the workforce is periodically evaluated to ensure knowledge and skills are current with the most up-to-date standards and accessibility practices
- training is part of the onboarding process
- periodic analysis has been used to identify gaps in knowledge as well as training materials
- annual training (conferences, events, online, etc.) is provided to maintain skills current with ICT accessibility requirements and industry best practices
- workforce inclusion training incorporates accessibility for persons with disabilities, and certification programs are available
- tracking systems are in place and consistently used to maintain training inventory, measure skills, and track completion
- training to enhance accessibility knowledge and skills relevant to each individual's position is required, measured, and monitored for improvement.

3.2.2 Proof Points

Knowledge and skills proof points may include but are not limited to:

3.2.2.1 Assessing Current Skills to Identify and Address Gaps

Assessments may include:

- organizational surveys that identify current skill levels and gaps
- tracking employee training for ICT accessibility skills
- certification or competency reviews and programs
- accessibility criteria integration into employee performance measurements.

3.2.2.2 Building and Maintaining Organizational Capacity

Organizational capacity may include:

- implementation of role-based training plans and curricula
- procuring external training resources as needed
- incorporation of digital accessibility training curricula into organizational learning management, tracking, and auditing systems
- accessibility training when onboarding all new employees
- accessibility requirements included in position descriptions
- subject matter experts (SMEs) positioned within the organization to provide training and support
- organizing or attending digital accessibility events to increase awareness and knowledge
- awareness campaigns (also pertinent to the Cultural dimension)

3.2.2.3 Dimension Integration

 Training and learning programs should be integrated into proof points for each dimension

3.3 Support

Both internal employees and external customers with disabilities need support with regard to the organization's ICT. This includes reasonable accommodations for employees and customer support specific to users' ICT accessibility needs.

3.3.1 How to Evaluate Support Maturity Level

- 1. Download the maturity model spreadsheet.
- 2. List all the organization's current "Support" efforts.
- 3. Compare the list to the spreadsheet to decide which proof points will be used to assess your organization's "Support" accessibility maturity. Not all proof points will be used for every business or organization. The proof points in section 3.3.2 are non-exhaustive examples of criteria.

The level is **Inactive** when proof points demonstrate that::

• no effort has been made or only isolated efforts have been identified.

The level is in **Launch** when proof points demonstrate that:

- Plans are in place to provide basic information about accessibility support to customers and employees, but there hasn't been any execution yet. This may include:
 - o a written reasonable accommodation policy and process
 - o relevant accessibility and accommodation support information.

 Accessibility support training relevant to each individual's position is planned but hasn't been provided yet.

The level is in **Integrate** when proof points demonstrate that:

- the customer-facing website has a dedicated accessibility help section with frequently asked questions (FAQ) or help topics
- tools and processes are in place to facilitate requests for employee accommodations
- hiring managers have access to disability awareness training
- accessibility support training relevant to each individual's position has started.

The level is in **Optimize** when proof points demonstrate that::

- fully trained customer support staff able to support users' accessibility questions
- multiple ways to communicate with technical support that meets the needs of customers with disabilities are provided
- ICT accessibility support is available for all internally and externally used ICT
- training programs are in place for ICT support staff, and staff has been trained
- continuous improvement plans are ongoing
- accessibility support training relevant to each individual's position is required, measured, and monitored for improvement.

3.3.2 Proof Points

Support proof points may include but are not limited to:

- written policy on requesting and providing employee ICT-related accommodations
- publicly available (and accessible) web accessibility statement with pointers to support mechanisms
- support mechanisms are accessible
- help topics or FAQs that are specific to accessibility
- training for customer support agents (or internal ICT support staff) in accessibility, assistive technology, and disability etiquette and awareness
- established disability-focused employee resource groups (ERG) with executive sponsorship
- validation process in place to manage accessibility feedback
- accessibility feedback is incorporated to facilitate continuous improvement of identified ICT
- defined and documented methods to evaluate the effectiveness of accessibility support, actively in use.

3.3.2.1 Support Staff Training

• Training is in place for support staff to build and maintain relevant skills supporting this dimension's proof points.

3.4 ICT Development Lifecycle

Accessible Information and communication technologies (ICT) serve as a critical enabler that allows persons with disabilities to realize full and effective opportunities to participate, on the basis of equality, in all aspects of society and development that involve technology. Accessibility should be considered throughout the entire ICT development lifecycle: from idea conception to design, development, testing, production of an ACR based on the VPAT, user research, maintenance, and obsolescence. Training programs must be established and ongoing to have the necessary skills for the ICT Development Lifecycle dimension.

3.4.1 How to Evaluate ICT Development Lifecycle Maturity Level

- 1. Download the maturity model spreadsheet.
- 2. List all the organization's current "ICT Development Lifecycle" efforts.
- 3. Compare the list to the spreadsheet to decide which proof points will be used to assess your organization's "ICT Development Lifecycle" accessibility maturity. Not all proof points will be used for every business or organization. The proof points in section 3.4.2 are non-exhaustive examples of criteria.

The level is **Inactive** when proof points demonstrate that::

no effort has been made or only isolated efforts have been identified.

The level is in **Launch** when proof points demonstrate that::

- there is some awareness and recognition of the need for accessible ICT development, but it is inconsistently approached or decentralized
- accessibility efforts are limited to new products, applications, and websites
- plans are in place to provide accessibility ICT development lifecycle training, relevant to each individual's position.

The level is in **Integrate** when proof points demonstrate that:

- there are ongoing process improvement efforts for accessibility in the ICT development lifecycle per role or discipline
- accessibility requirements are considered and practiced but not consistently applied during ICT design, development, and testing across the ICT portfolio
- remediation of existing products, applications, and websites has started
- training on ICT development lifecycle accessibility, relevant to each individual's position, has started.

The level is in **Optimize** when proof points demonstrate that:

• there's an ICT development accessibility thought leader at the organization who adheres to a structural, standardized, and reporting approach

- design specifications include accessibility guidance, developers consistently create
 accessible User Interfaces (UI), manual and automated accessibility testing is performed
 during development, and automated accessibility testing is incorporated into Continuous
 Integration/Continuous Delivery (CI/CD) build pipelines
- release management includes gates for accessibility quality
- maintenance releases are re-inspected for accessibility
- ACRs are updated and made available, as needed, for procurable ICT
- research deliberately seeks out and evaluates input from users with disabilities
- ICT development lifecycle accessibility training, relevant to each individual's position, is required, measured, and monitored for improvement.

3.4.2 Proof Points

ICT development lifecycle proof points may include but are not limited to:

3.4.2.1 User Research

- user research includes disabilities
- conduct user research focusing only on disabilities
- research participants are provided with applicable accommodations, such as more time for the session, assistive technology, virtual options, and details about the physical location for in-person sessions and how they will be provided access
- forms, releases, instructions, or other materials are accessible
- archetypes, personas, journey maps, and other relevant synthesis and output from user research include people with disabilities

3.4.2.2 Design

- designers have access to accessibility checklists, guidelines, annotation templates, etc.
- accessibility reviews are part of the design process
- design and content style guides include accessibility considerations
- design systems components include accessibility considerations
- design work delivered to developers includes accessibility information and annotations that meet relevant accessibility standards
- consistent approach to designing accessibility features across products
- user stories, jobs to be done (JTBD), etc., include persons with disabilities

3.4.2.3 Development

- accessible developer implementation resources
 - team channels to discuss accessibility direct messaging, office hours, email
 - information pages
- developer's accessibility checklists
- consistent approach to implementing accessibility features across products

- documented way to triage and prioritize fixing accessibility issues and address customer-reported feedback on accessibility
- accessibility requirements included in the definition of done

3.4.2.4 Quality Review Through Release

- consistent approach to accessibility testing and releasing products
- testing process documents steps for manual accessibility testing, utilizing assistive technology
- testing process includes automated accessibility testing
- schedule includes stakeholder activities focused on accessibility
- bug-tracking system includes an accessibility category
- prioritization and review system for accessibility defects
- accessibility is identified as a product release gate
- documented testing steps and cadence for agile delivery of changes without a full release cycle. Some examples are:
 - content review for website updates
 - o content review for social media posts
- accessibility Conformance Report (ACR) authoring guide for commercial off-the-shelf (COTS) products used within the business, such as Google Workspace, Microsoft Office, or Jira

3.4.2.5 ICT Development Training

 accessibility in the ICT lifecycle training is in place to build and maintain relevant role-based skills in support of this dimension's <u>proof points</u>

3.5 Personnel

Qualified individuals with disabilities should be employed throughout an <u>organization</u>'s hierarchy (that is, all job types, all authority levels, and every department) so that their unique insights and lived experiences can better inform decision-making.

3.5.1 How to Evaluate Personnel Maturity Level

- 1. Download the maturity model spreadsheet.
- 2. List all the organization's current "Personnel" efforts.
- 3. Compare the list to the spreadsheet to decide which proof points will be used to assess your organization's "Personnel" accessibility maturity. Not all proof points will be used for every business or organization. The proof points in section 3.5.2 are non-exhaustive examples of criteria.

The level is **Inactive** when proof points demonstrate that:

no effort has been made or only isolated efforts have been identified.

The level is in **Launch** when proof points demonstrate that:

- including employees with disabilities in the workforce has been recognized
- targeted recruiting of qualified candidates with disabilities has been initiated, but recruitment, retention, engagement, and activities related to disability inclusion are not well-organized
- accessible hiring announcements that encourage applications from the disability community are posted
- equal employment opportunities for people with disabilities is specifically stated in company diversity and inclusion policies and statements
- a champion has been designated to facilitate and mature disability inclusion
- plans are in place for providing disability inclusion training, relevant to each individual's position.

The level is in **Integrate** when proof points demonstrate that:

- a disability inclusion roadmap that drives ICT accessibility is in place
- the overall organizational approach to evaluating recruitment, retention, advancement, and engagement is defined
- process integration for maturing disability inclusion efforts for ICT accessibility is in progress but not consistently implemented across the <u>organization</u>
- the company has identified strategic positions to employ people with disabilities who will help audit and drive the development of accessible products and services
- targeted recruiting of employees with disabilities with an accessible recruiting process
- training on accessibility inclusion knowledge and skills relevant to each individual's position has started.

The level is in **Optimize** when proof points demonstrate that:

- employees with disabilities are leveraged throughout the <u>organization</u> to achieve full ICT accessibility maturity
- organization-wide, disability inclusion staffing efforts are well-defined, evaluated, remediated, and integrated with ICT accessibility efforts and goals across the organization
- employees with disabilities hold critical decision-making positions and are included in all areas of the organization to drive accessibility in every facet of the business
- the disability employee resource group (ERG) is leveraged to inform accessibility decision-making
- employees with disabilities are leveraged to audit accessibility
- employees with disabilities are leveraged for product development
- employees with disabilities are leveraged for the development of accessible services.

3.5.2 Proof Points

3.5.2.1 Recruiting

- established goals for recruiting employees with disabilities
- hiring announcements with diversity statements encouraging and attracting applications from people with disabilities
- a gap analysis or needs assessment to understand where the business is falling short of including applicants with disabilities
- preferential hiring initiatives to recruit employees with disabilities, where not prohibited by law

3.5.2.2 Accessible Job Application Platform

- hiring tools, job boards, etc., meet a specified level of accessibility
- recruiting communications meet a specified level of accessibility
- accessibility audit of jobs' website
- accessibility audit of the application process

3.5.2.3 Strategic Engagement

- established employee resource group (ERG), with an executive sponsor, for employees with disabilities to directly contribute first-hand knowledge and lived experience to accessibility efforts
- product and project focus groups of employees with disabilities
- mentoring program for employees with disabilities
- employees are informed of and have access to a defined accommodation process
- accessible employee evaluations take accessibility into consideration
- accessible employee onboarding processes

3.6 Procurement

Procurement is a strategic process focused on finding and acquiring cost-effective products needed by an organization. Activities in procurement include sourcing, negotiation, and selection of goods and services.

The majority of an organization's ICT assets result from procurement transactions and contracts. When accessibility criteria are integrated into procurement processes and contract language, an organization can be more capable of providing accessible products, services, and workplaces.

3.6.1 How to Evaluate Procurement Maturity Level

1. Download the maturity model spreadsheet.

- 2. List all the organization's current "Procurement" efforts.
- 3. Compare the list to the spreadsheet to decide which proof points will be used to assess your organization's "Procurement" accessibility maturity. Not all proof points will be used for every business or organization. The proof points in section 3.6.2 are non-exhaustive examples of criteria.

The level is **Inactive** when proof points demonstrate that:

• no effort has been made or only isolated efforts have been identified.

The level is in **Launch** when proof points demonstrate that:

- work has been initiated to identify and integrate accessibility into procurement processes and accessibility language into all ICT-related solicitation and contract documents and vendor responses throughout the procurement life cycle
- some plans are in place for providing accessibility procurement knowledge and skills relevant to each individual's position.

The level is in **Integrate** when proof points demonstrate that:

- solicitation and contract language are complete, and responses have been analyzed by accessibility or trained procurement professionals
- vendors are required to submit accessibility documentation to be evaluated as part of the overall vendor assessment
- a communications mechanism has been put in place to inform vendors of accessibility requirements
- accessibility is a monitored element of the procurement life cycle
- accessibility criteria are included in contract renewal negotiations
- training on accessibility procurement knowledge and skills relevant to each individual's position has started.

The level is in **Optimize** when proof points demonstrate that:

- full and consistent use of accessibility processes, criteria, contract language, and decision-making to procure and maintain accessible products and services throughout the procurement life cycles
- procurement processes are regularly reviewed and refined as needed
- training on accessibility procurement knowledge and skills relevant to each individual's position is required, and improvement is measured and monitored.

3.6.2 Proof Points

Procurement proof points may include but are not limited to:

3.6.2.1 Policy Documentation

- published ICT accessibility policy that includes procurement or a separate procurement policy that includes accessibility
- accessibility requirements and other information are communicated to vendors

3.6.2.2 Consistent Use of Standardized Procurement Language

- standardized solicitation language that includes accessibility for ICT procurement
- standardized solicitation language that includes accessibility in ICT contracts
- accessibility-specific solicitation forms and templates for items like bids and proposals

3.6.2.3 Consistent Evaluation Process and Methods

- proof of accessibility evaluations
- documented evaluation methodology
- submission scoring methodologies

3.6.2.4 Accessibility Contract Language

- requirement that automated and/or manual accessibility testing has been performed on the product, service, or final deliverable
- reviews of the development life cycle accessibility criteria integration and development
- warranties and remedies sections in procurement contracts include accessibility
- vendor corrective actions and remediation plans pre and post-deployment
- executed contract examples with accessibility language
- procurement-specific accessibility checkpoint requirements for custom development contracts.

3.6.2.5 Accessibility in Procurement Program Management

- an accessibility audit to determine where the procurement program system is not meeting accessibility requirements has been conducted
- lifecycle of procurement contracts has a defined, documented, and tracked lifecycle
- procurement-related accessibility metrics are tracked and documented
- a defined process for identifying and addressing complaints

3.6.2.6 Procurement Training

 accessibility-related procurement training is in place for staff to build and maintain relevant skills in support of this dimension's proof points

3.7 Culture

Organizational culture consists of shared beliefs, values, policies, and processes established by leaders that ultimately shape employee perceptions, behaviors, and understanding.

To demonstrate cultural maturity in accessibility, all aspects of the <u>organization</u>'s operation, processes, and skills should include considerations for disability inclusion. Every member of the organization should understand and be sensitive to the importance of ICT accessibility, including their personal role and responsibilities in meeting the organization's accessibility goals. Accessibility should be an integral part of diversity and inclusion within the organization, with a clear recognition of the benefits of disability inclusion and the impact of ICT accessibility on people with disabilities to facilitate access to jobs, services, and other aspects of life.

3.7.1 How to Rate and Evaluate Culture Maturity Level

- 1. Download the maturity model spreadsheet.
- 2. List all the organization's current "Culture" efforts.
- 3. Compare the list to the spreadsheet to decide which proof points will be used to assess your organization's "Culture" accessibility maturity. Not all proof points will be used for every business or organization. The proof points in section 3.7.2 are non-exhaustive examples of criteria.

The level is **Inactive** when proof points demonstrate that:

no effort has been made or only isolated efforts have been identified.

The level is in **Launch** when proof points demonstrate that:

- there's a recognized need for <u>organization</u>-wide cultural programs on accessibility and disability inclusion, and planning has been initiated, but with limited activity
- work has been initiated for:
 - integrating ICT accessibility into organizational processes and governance, including policies and practices that impact employees and external audiences
 - identifying leadership for the initiative
 - formulating cultural programs
- plans are in place for providing accessibility culture knowledge and skills relevant to each individual's position.

The level is in **Integrate** when proof points demonstrate that:

- cultural programs have been created and initially deployed
- metrics have been established, and hiring practices have been implemented
- policies are in place with partial execution
- diversity and inclusion are promoted, but no action plan has been developed
- communities of practice have been established
- training on accessibility culture knowledge and skills relevant to each individual's position has started.

The level is in **Optimize** when proof points demonstrate that:

- there's a strong cultural awareness, appreciation, sensitivity, and support for all aspects
 of ICT accessibility and people with disabilities
- policies, processes, and practices are in place, used consistently, and regularly reviewed and refined as needed
- all employees understand and are sensitive to the importance of ICT accessibility and how it fits within their roles and responsibilities. They also appreciate the value of a diverse population within and outside the organization
- training on accessibility culture knowledge and skills relevant to each individual's position is required, measured, and monitored for improvement

3.7.2 Proof Points

Culture proof points may include but are not limited to:

3.7.2.1 Organizational Culture of Disability Inclusion

- executive sponsor for digital accessibility
- executive-level digital accessibility program leadership
- executive statement of the organization's commitment to digital accessibility
- IT accessibility policy in place and implemented
- a proactive approach to digital accessibility included in business strategy
- digital accessibility promotion as a market differentiator included in business strategy
- core values incorporate digital accessibility as a necessity for disability inclusion
- · code of conduct includes digital accessibility
- diversity, equity, and inclusion activities include a disability focus
- communities of practice include a digital accessibility focus
- ICT accessibility criteria are integrated into employee/officer performance plans (if relevant)
- mandated and monitored employee support for digital accessibility and disability inclusion
- monitoring and improvement of digital accessibility program
- accessibility and disability inclusion-specific questions included in regular employee satisfaction surveys
- defined and documented process for employee feedback on accessibility and disability-inclusion efforts

3.7.2.2 General Training

 accessibility-related training to build and maintain relevant skills in support of this dimension's proof points