# (Agency’s) Digital Accessibility Plan

Updated MM/DD/YYYY

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## 

## Instructions:

* Replace (AGENCY) with your agency name.
* Content in parentheses are instructions only. You can remove once you finish editing your plan

## Introduction

As referenced in the state’s digital accessibility roadmap **(ADD LINK**), each agency will create a digital accessibility plan.

(AGENCY) is committed to providing online services that are accessible to the widest possible audience, regardless of technology or ability. Digital accessibility is equally as important as information security. Just as the State of Missouri meets federal law to protect privacy, information used by the state must meet state and federal accessibility standards requirements.

The following accessibility plan assists with a long-term strategic approach to continue improvements to the accessibility of (AGENCY) information. This document summarizes (Agency’s) web accessibility standards and protocol and ongoing management plan, including the following components:

* Information related to digital accessibility laws, standards and practices, for the State of Missouri and (AGENCY).
* Details pertaining to (Agency’s) current resolution agreement, and the procedural improvements being made as a result, including accessibility training.
* Tools and techniques currently used to test the accessibility of webpages and content.
* Clarity on the roles and responsibilities of team members who perform accessibility-related functions.

(The following 2 sections apply to MO State Government only)

## Missouri’s Law for Digital Accessibility

Effective in 1999, [Section 161.935, RSMo](http://revisor.mo.gov/main/OneSection.aspx?section=161.935&bid=7938&hl=) requires accessibility in the development, procurement, maintenance or use of Information and Communication Technology (ICT), or when administering contracts or grants that include the procurement, development, or upgrading of ICT.

## Missouri’s ICT Standard and Guidelines

A work team comprised of personnel from Missouri Assistive Technology (MoAT), the Office of Administration Information Technology Services Division (ITSD), and the Missouri Department of Conservation created the Missouri state ICT access standards in 2003. The MoAT Advisory Council approved the updated standards on 9/13/24.

* + [Missouri State ICT Standard 3.0 – 2024](https://at.mo.gov/wp-content/uploads/MOStateICTStandard-2024-final.docx)
  + [Definitions of Terms](https://at.mo.gov/ict-terms/)

The standard document references the following guidelines:

* [**WCAG 2.1 AA**](https://www.w3.org/WAI/WCAG22/quickref/?currentsidebar=%23col_customize&levels=aaa&versions=2.1)effective 3/13/25
* [**WCAG 2.2 AA**](https://www.w3.org/WAI/WCAG22/quickref/?currentsidebar=%23col_customize&levels=aaa&versions=2.1)effective 4/6/26

1. [**ADA Title II Web Accessibility Update**](https://www.ada.gov/resources/2024-03-08-web-rule/)effective 4/24/26

* As part of the State Digital Accessibility Roadmap **(ADD LINK)** and corresponding agency plans, the **target implementation deadline is 4/24/26**.

(Following applies to State and Local Government)

## **Department of Justice’s Title II Update of the Americans with Disabilities Act (ADA)**

Effective 4/24/24, the [ADA Title II Web Accessibility Update](https://www.ada.gov/resources/2024-03-08-web-rule/) requires state and local governments to make sure that their services, programs, and activities are accessible to people with disabilities. This includes the services, programs, and activities that state and local governments offer online and through mobile apps.

#### Compliance Dates for Title II Update

| **State and local government size** | **Compliance date** |
| --- | --- |
| 0 to 49,999 persons | 4/26/27 |
| Special district governments | 4/26/27 |
| 50,000 or more persons | 4/24/26 |

## Accessibility Principles

The [W3C Web Accessibility Initiative (WAI)](https://www.w3.org/WAI/) has developed the “POUR principles” for web accessibility, which provide guidelines for creating websites that are perceivable, operable, understandable, and robust.

* **Perceivable:** This principle refers to making sure that web content can be perceived by all users. This includes providing text alternatives for non-text content, such as images and videos, and making sure that content is presented in a clear and easy-to-read format.
* **Operable:** This principle is about ensuring that web content is operable by all users, regardless of their abilities. This includes providing keyboard accessibility, making sure that users can easily navigate through the site, and avoiding any content that could cause seizures or other physical reactions.
* **Understandable:** This principle is about making sure that web content is understandable to all users. This includes using clear and simple language, organizing content in a logical and easy-to-understand way, and providing feedback to users when they complete actions on the site.
* **Robust:** This principle is about making sure that web content is robust and can be interpreted by a wide variety of [user agents](https://at.mo.gov/ict-terms/#user-agent), including [assistive technologies](https://at.mo.gov/ict-terms/#assistive-technology). This includes using valid HTML and CSS, avoiding deprecated code, and making sure that all content is accessible via multiple platforms and devices.

## (AGENCY) Digital Accessibility Statement

The[state’s accessibility statement](https://www.mo.gov/accessibility/) is linked in all agency website footers.

(**Local Government:** Create an accessibility statement that you link into your websites’ footer and either link to it here or place the text of it here. Make sure to include a way to communicate accessibility issues to the agency.) Here is an example: [State of Missouri’s Accessibility Statement](https://www.mo.gov/accessibility/))

## (Agency’s) Digital Accessibility Issue Resolution

Our agency’s issue resolution policy is as follows:

(Create an internal accessibility issue resolution policy within your agency for your digital accessibility coordinator to follow. This will be drafted by your agency legal team. Include it here. Example below:)

If information on a (AGENCY) webpage, document, or application is not accessible, customers are instructed online to contact (AGENCY) at (email, phone number and/or entry form). Customers are asked to provide their contact information, the URL where the inaccessible material is located, and the accessibility issue being experienced.

Within two business days after receipt of the issue/request, (Specific agency contact) will contact the customer initiating the issue/request to discuss the problem and the possible resolutions. (AGENCY) will provide the resolution within 30 business days, unless there is a justified longer timeline needed, explained to the complainant. Once the resolution is provided, (AGENCY) will confirm it is satisfactorily resolved.

## Procurement of Digital Services for (Agency)

* **Purpose:** As indicated in [Section 508](https://www.section508.gov/manage/laws-and-policies/section-508-law/) and [ADA Title II](https://www.ada.gov/resources/2024-03-08-web-rule/), the law also requires accessibility of any procured information technology (digital services).
* **Scope:** This policy applies to all digital services purchased, contracted for or licensed by (AGENCY), including but not limited to

* + [Web Content](https://at.mo.gov/ict-terms/)
  + [Mobile Applications](https://at.mo.gov/ict-terms/)
  + [Digital Documents](https://at.mo.gov/ict-terms/)
* **Policy Statement:** (AGENCY) shall procure digital services that meet the WCAG version listed in the “Missouri’s ICT Standard and Guidelines” section to ensure that all users, including those with disabilities, have equal access to digital services.

### ***Requirements:***

* **Procurement solicitation documents:** All procurement solicitation documents (i.e., RFPs, IFBs, etc.) for digital services must include requirements for WCAG version listed in the “Missouri’s ICT Standard and Guidelines” section. This includes specifying the level of compliance required and referencing the relevant accessibility standards.
* **Evaluation of vendors:** (AGENCY) shall evaluate potential vendors for their expertise in accessibility, including reviewing their accessibility policies, practices, and experience working on accessibility projects.
* **Accessibility testing:** Potential vendors shall be required to conduct accessibility testing on their digital services to ensure they meet the WCAG version listed in the “Missouri’s ICT Standard and Guidelines” section. This testing should include both automated and manual testing.
* **Contract language:** The contract with the vendor must include the WCAG version listed in the “Missouri’s ICT Standard and Guidelines” section, including a statement that the vendor is responsible for ensuring the digital services meet these requirements. The contract shall also include provisions for addressing any accessibility issues that arise.
* **Monitoring compliance:** (AGENCY) shall monitor the vendor's compliance with the accessibility requirements specified in the contract. This shall include regular accessibility testing, reviewing accessibility documentation, and requesting remediation of any accessibility issues that arise.
* **Implementation:** (AGENCY) shall ensure that all staff involved in the procurement of digital services are aware of this policy and its requirements. This policy shall be incorporated into all relevant procurement procedures and guidelines.
* **Enforcement:** (AGENCY) shall enforce this policy through regular monitoring of compliance and by taking appropriate action, including withholding payment or terminating the contract, in the event of non-compliance.

### (***AGENCY) Procurement Contract Language***

(AGENCY) solicitations and contracts now include the following information accessibility assurance:

#### Digital Accessibility Requirement:

[RSMO 161.935](https://revisor.mo.gov/main/OneSection.aspx?section=161.935) requires that the procurement of information technologies comply with the provisions of Section 508 of the Workforce Investment Act of 1998 regarding development, procurement, maintenance or use of Information and Communication Technology (ICT). The [Missouri State ICT Standard](https://moat.mo.gov/ict-laws-standards) outlines compliance, equivalent facilitation and exceptions. ICT includes: [Web Content](https://at.mo.gov/ict-terms/), [Mobile Applications](https://at.mo.gov/ict-terms/) and [Digital Documents](https://at.mo.gov/ict-terms/). The contractor shall provide a description and assurance of conformance to the Missouri State ICT Standard through completion of a  [Voluntary Product Accessibility Template](https://moat.mo.gov/ict-procurement) (VPAT) or other comparable document.

The contractor must include information on what testing methods they use to check for accessibility Examples include, but are not limited to: automated testing tools, using an accessibility standards checklist, keyboard only testing, content scaling testing and assistive technology testing such as a screen reader.

The contractor must identify an accessibility coordinator who will be responsible for ensuring conformance with ICT accessibility standards during product development and in the final version deployment and shall provide a description of the accessibility coordinator’s experience and expertise in developing/customizing products to conform with ICT accessibility standards.

The contractor must promptly respond to any complaint brought to its attention regarding accessibility of the products provided hereunder that were specified in the contractor’s awarded bid response as compliant products. The contractor shall resolve such complaints by bringing the product into compliance with the applicable Missouri State ICT Standard at no additional cost to the state. The contractor shall indemnify and hold harmless the State of Missouri and any Missouri government entity purchasing the contractor’s products from any claim arising out of the contractor’s failure to comply with the aforementioned requirements.

(this following section is for State Government only)

## Undue Burden, Fundamental Alteration, or Direct Threat

(AGENCY) is committed to providing accessible services to all individuals, including those with disabilities. However, there may be instances where full compliance with all accessibility standards may not be achievable due to:

* **Undue Burden:** Implementing certain accessibility measures may pose an unreasonable financial, technical, or administrative burden on our limited resources, potentially impacting our ability to deliver essential services effectively.
* **Fundamental Alteration:** Strict adherence to accessibility standards could fundamentally change the nature of some of our programs, services, or activities, rendering them unfeasible or ineffective.
* **Direct Threat:** In rare cases, full accessibility might pose a direct threat to the health or safety of individuals, requiring specific risk assessments and alternative solutions.

In such situations, (AGENCY) will:

* + **Demonstrate the burden or risk:** We will transparently explain the specific reasons why full compliance is not achievable in a particular instance.
  + **Explore alternative solutions:** We will actively seek alternative solutions or reasonable accommodations that effectively address accessibility needs without causing undue burden, fundamental alteration, or direct threat. This may include providing different formats of information, alternative communication methods, or accessible technology solutions.

## Web Content Exclusions

Per the Missouri State Web Accessibility Standard and Title II Web Accessibility update, the following are excluded content from needing to fix accessibility issues:

* [Archived web content](https://at.mo.gov/ict-terms/) (prior to 4/24/26)
* [Preexisting conventional electronic documents](https://at.mo.gov/ict-terms/)
* Third party content, unless the third party is posting due to contractual, licensing, or other arrangements
* [Individualized password-protected documents](https://at.mo.gov/ict-terms/)
* [Preexisting social media posts](https://at.mo.gov/ict-terms/)

## Roles and Responsibilities

(Keep in mind that these are suggested names and roles. If you have already implemented accessibility roles or teams of people, you do not need to change role names)

### Accessibility is a team effort. There isn’t a single office, agency, or division within the state who will make digital services accessible. Every state office, agency, and division is responsible for ensuring that their digital content and services are accessible.

### State Digital Accessibility Coordinator(s)

This role is a collaborative between [Missouri Assistive Technology](https://at.mo.gov/it-access) and [Office of Administration – ITSD](https://oa.mo.gov/information-technology-itsd) (Web Team)

* Ensure adherence to [accessibility compliance standards](https://at.mo.gov/ict-laws-standards/). Review and update standards as needed.
* Stay up-to-date on web accessibility laws, initiatives and trends.
* Prepare and provide accessibility training, technical assistance and promote awareness statewide.
* Conduct accessibility testing on all newly developed websites created by the web team as well as other sites and applications upon request. An accessibility error report for each site or application will be generated.
* Serve as administrator of the state’s [Siteimprove](https://siteimprove.com) platform.
* Facilitate various accessibility initiatives across the state.
* Serve as members of the state’s web accessibility working group.

### (AGENCY) Executive Leadership

* Support digital accessibility as an agency priority with commitment to investing in people and resources.
* Support implementation of this plan through agency personnel policies, procedures, onboarding process and general communication.
* Support the requirement of a “Digital accessibility awareness/document accessibility” course for all office-level staff to strengthen agency wide digital accessibility skills.

### ITSD Web Application Development and Website Development/Design Team

* Attend role-based accessibility training as provided by the State Digital Accessibility Coordinator(s) or through one of the state’s online learning platforms.
* Website Design Team: Create protypes/design patterns and identify (annotate) where accessibility needs to be included.
* Build and test websites and web applications that comply with the [state’s web accessibility standard](https://at.mo.gov/ict-laws-standards/) throughout all project phases, utilizing the [web accessibility test planning](https://at.mo.gov/ict-websites-webapps/) page.
* Fix accessibility issues reported by customers, the Website/Web Application Development Team, the agency digital accessibility coordinator or through Siteimprove.

### (AGENCY) Digital Accessibility Coordinator

Per Step 2 of the State Digital Accessibility Roadmap (INSERT LINK), an agency digital accessibility coordinator was identified. This individual will:

* Coordinate (Agency’s) compliance with state accessibility law and standards. Become familiar with the steps and timelines of the State’s Digital Accessibility Roadmap (INSERT LINK)
* Coordinate with Professional Development staff the implementation of a required “digital accessibility awareness/document accessibility” course for all office-level staff that will be made available via MOVERS Learn.
* Provide technical assistance to agency web content and document creators
* Provide training or training resources on various digital accessibility topics.
* Promote digital accessibility awareness internally through staff communication as well as the creation of a digital accessibility webpage on your agency intranet. [Missouri Assistive Technology hosts a wide variety of accessibility resources](https://at.mo.gov/it-access/), so link to it when possible, This will reduce the time you spend maintaining the same or similar content.
* Respond to customer inquiries related to web accessibility
* Fix accessibility issues identified by customers, staff, or through Siteimprove
* Identify inaccessible online content and remediate. Content includes:
  + - * Public web content and digital documents
      * Intranet web content and digital documents
      * All social media platform content
      * Third-party vendor and licensed content
* Organize ongoing audits of the (AGENCY’S) digital accessibility through manual testing and Siteimprove reports.
* Recruit office/division accessibility champions. Meet regularly with Office Accessibility Champions address accessibility issues and discuss remediation procedures.
* Attend appropriate and regular accessibility trainings as provided by the State Digital Accessibility Coordinator(s), the state’s online learning platform or other reputable sources.

### (AGENCY) Office/Division Digital Accessibility Champions

* Champion accessibility as an agency priority through sharing best practices and spreading awareness.
* Participate in Office Accessibility Champions meetings as needed to address accessibility issues and discuss remediation procedures
* Attend appropriate and regular accessibility training as provided by the (AGENCY) Digital Accessibility Coordinator, the state’s online learning platform or other reputable sources.
* Provide technical assistance to office/division web content and document authors

### (AGENCY) Graphic or Publication Designers

* Complete relevant accessibility training as provided by (AGENCY) Digital Accessibility Coordinator or the state’s online learning platform.
* Create graphics and publications that are compliant with this policy, including color contrast
* Fix accessibility issues identified by (AGENCY) Digital Accessibility Coordinator
* Adhere to (Agency’s) [color contrast guidelines](https://colourcontrast.cc/) to ensure the contrast between different color combinations meets WCAG standards. Refer to agency’s color brand.
* Participate in Office/Division Digital Accessibility Champions meetings as needed

### (AGENCY) Video, Audio or Multimedia Creators

* Include accurate closed captions in video content. Automated captions are not always accurate, so review and edit them for accuracy.
* Provide audio descriptions for all visual content that is important to understanding the video. Ensure that the audio descriptions accurately convey the visual content. Ensure that the audio descriptions are synchronized with the video content.
* Ensure that the video does not contain flashing or rapidly changing content that could cause seizures or other health issues

### Include text-based transcripts for audio-only content.

### Ensure that the video content does not rely solely on color to convey information and includes proper color contrast.

### (AGENCY) Legal

* Establish and ensure web accessibility grievance procedure is adhered to.
* Adhere to procurement guidelines and standards for new technologies.
* Participate in Digital Accessibility Champions meetings as needed

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### All (AGENCY) Office Staff

* Complete required “Digital Accessibility Awareness/Document Accessibility” training.

## Role-Based Training Plan

Training is an important investment that proves beneficial as accessibility knowledge increases and creating accessible content becomes more common practice. As the program matures, implementing accessibility will require little to no time and effort to remediate because it’s integrated into content development lifecycle from the beginning.

Staff that are assigned to a particular role that is more closely involved with content creation and web updates will be trained for that role during onboarding, with periodic refresher training organized or provided by the Digital Accessibility Coordinator.

(**Note:** a “Digital Accessibility Awareness/Document Accessibility” course will be made available on MOVERS Learn no later than 6/30/25. Approximate length: 30 minutes)

### State Digital Accessibility Coordinator, ITSD Web Application Development and Website Development/Design Team

* + [Developing Websites for Accessibility (Pluralsight)](https://app.pluralsight.com/channels/details/c4f4d434-3b7e-42b4-a8c9-4f1060629bb2), 15 hours

### (AGENCY) Digital Accessibility Coordinator & Office Accessibility Champions

* [Making a Case for Accessibility in Your Organization](https://www.linkedin.com/learning/making-a-case-for-accessibility-in-your-organization%20) - 1 hour, 48 minutes
* [Accessible Communications in the Workplace (LinkedIn Learning)](https://www.linkedin.com/learning/content/2222051?contextUrn=urn%3Ali%3AlyndaLearningPath%3A1%7EAAAAAAIgV7Q%3D2566017&accountId=35674036&u=35674036&success=true&authUUID=AaeQqcq6Sm2a%2FdfyYP9kQQ%3D%3D) - 6 hours, 24 minutes
  + Digital Accessibility Awareness/Accessible Documents
  + Accessible Meetings
  + Accessible Virtual and Hybrid Meetings/Events
  + Accessible Documents-Creating Accessible PDFs
  + Accessible Multimedia
  + Accessible Social Media Content

### (AGENCY) Graphic or Publication Designers

* [Accessibility-First Design](https://www.linkedin.com/learning/accessibility-first-design) (LinkedIn Learning) – 1 hour, 24 minutes

### (AGENCY) Video Creators

* [Creating Accessible and Inclusive Video](Creating%20Accessible%20and%20Inclusive%20Video) (LinkedIn Learning) – 1 hour, 20 minutes

### All (AGENCY) Office Staff

* ***Required*** “Digital Accessibility Awareness/Document Accessibility” course on MOVERS Learn. See Step 10 of the Digital Accessibility Roadmap for more background on this required course.
* (Come up with a timeline for all staff to complete – for example, within 3 months of announcing training. Recommendation for all staff to complete course no later than 12/31/25.)
* (Recommendation to come up with a refresher course timeline as well, for example, every 2 years or align with other refresher courses)

## Testing Tools and Techniques

(AGENCY) will incorporate a variety of tools, techniques, methods, and processes to identify accessibility barriers and meet existing and future assistive technology needs. The following tools and techniques are not intended to represent an inclusive list, but a shortlist of tools and processes that (AGENCY) currently uses or will use in its accessibility compliance initiatives. This list may grow as other options become available or as need arises.

(Identify tools you will use as part of your accessibility testing process. The following are examples.)

### Siteimprove Enterprise Automated Testing

(AGENCY) has used [Siteimprove](https://at.mo.gov/it-access/siteimprove/) since November 2019 to monitor a majority of accessibility guidelines across a portion of the state’s websites and PDF documents. It removes the time intensive task of manually reviewing web content. Siteimprove automatically generates new Accessibility, Quality Assurance and SEO reports every four days or on demand.

### Siteimprove plugins within Drupal and WordPress

Take advantage of the plugins included in both Drupal and WordPress to review accessibility issues.

### Screen Reader Tool — NVDA

(AGENCY) uses [NVDA](https://www.nvaccess.org/) (Non-Visual Desktop Access) to test web accessibility, which allows blind and vision impaired people to access and interact with the Windows operating system and many third-party applications.

### Microsoft Office Accessibility Checker

[Microsoft Office accessibility checker](https://support.microsoft.com/en-us/office/improve-accessibility-with-the-accessibility-checker-a16f6de0-2f39-4a2b-8bd8-5ad801426c7f) – ability to check a partial list of accessibility errors. Fixing accessibility errors in your source documents is the best option.

### PDF Remediation Tools

* [Adobe Acrobat Professional Accessibility Checker](https://www.adobe.com/accessibility/products/acrobat/using-acrobat-pro-accessibility-checker.html/) – An accessibility checker that automates the fixing of some accessibility fixes while requiring a bit more knowledge to do advanced editing.
* [Equidox Software as a Service (SaaS)](https://equidox.co/pdf-solutions/pdf-remediation-services/)– A cloud-based service that includes automated features to simplify many manual PDF remediation tasks.
* [PAC 2024](https://pac.pdf-accessibility.org/en) – A free desktop PDF accessibility tool, great for in-depth evaluation with some ability to directly remediate files.

### Color Contrast Checkers

* [Color Contrast Analyser](https://developer.paciellogroup.com/resources/contrastanalyser) free desktop tool
* [WebAIM Color Checker](https://webaim.org/resources/contrastchecker) free online tool

### ICT Testing Toolkit

Missouri Assistive Technology has available an [ICT Testing Toolkit](https://at.mo.gov/ict-testing-kit/) which you can borrow free for up to five weeks at a time.

[WriteClearly](https://www.openadvocate.org/writeclearly/)  
[WriteClearly](https://www.openadvocate.org/writeclearly/) is bookmarklet that you save to your browser bookmarks. Test the reading grade level of a web page as well as get feedback on how to write more effectively in plain language

## Document/PDF Procedures & Guidelines

(This is a sample procedure where the Agency Digital Accessibility Coordinator uploads all documents to their website. Edit as you need to align with your agency’s PDF publishing procedures.)

### Does it need to be a document?

The first question to ask is does it need to be a document or can it be a webpage?   
[Determining whether it needs to be a document](https://at.mo.gov/it-access/document-vs-webpage-which-one/)

### PDF Accessibility Review & Remediation

(AGENCY) team members are responsible for document accessibility and are encouraged to review the [accessible electronic documents page](https://at.mo.gov/ict-electronic-documents/). This includes checklists for a wide variety of document types.

#### PDF Remediation Workflow

1. [Create an accessible source document from the start](https://at.mo.gov/ict-electronic-documents/) and apply accessibility principles
2. Run the accessibility checker in program where available (Microsoft Office)
3. Convert to a tagged PDF (save in a PDF format, not “print” to a PDF file)
4. Run the PDF document through one of the PDF remediation tools listed under “Testing Tools”
5. Perform an accessibility check
6. Take note of the items that are flagged as accessibility issues
7. Go back into your source document to fix any issues
8. Return to step 4 and repeat until you remove all the issues
9. If you cannot fix the issues in the source document, then run the PDF through Adobe Acrobat Professional and fix the issues through the platform

#### If you cannot fix the PDF accessibility issues

If the team member and (AGENCY) Digital Accessibility Coordinator cannot remediate the accessibility issues within the PDF, or the remediation work is too complex for the time and resources available, (AGENCY) Communications will coordinate with the appropriate (AGENCY) team members to submit the PDF for review and remediation by a third-party vendor.

## Webpage Content Procedures & Guidelines

(The number of web content editors each agency has will vary.)

The following includes the core accessibility skills needed to edit webpage content.

* [Seven core accessibility skills for web content editors](https://accessibility.umn.edu/getting-started/learn-7-core-accessibility-skills)