



# Platte River Power Authority: Improving digital accessibility

## Digital accessibility plan

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## Section 1: Introduction

Platte River Power Authority (Platte River) is committed to providing access to public meetings and information to the widest possible audience. Digital equity aligns with our core values of integrity, service, respect, and operational excellence.

- Platte River is committed to providing online services that are accessible to the widest possible audience, regardless of ability.
- Platte River’s information and communication technology (ICT) will comply, at a minimum, with applicable Level A and AA success criteria of the current non-draft version of the Web Content Accessibility Guidelines (WCAG) or the version specified by the Governor’s Office of Information Technology (OIT).
- Platte River acknowledges that achieving digital equity requires a long-term strategic approach through continuous, iterative, and evolving processes.

This resource is divided into four main sections to help you learn about:

- Why we are doing this (legal requirements): In alignment with our commitment to digital equity, various laws mandate that our public meetings and information comply with or surpass internationally recognized accessibility standards and best practices.
- How we are approaching this (organizational approach): Platte River formed its digital accessibility program to develop and improve digital access. This program is managed by a working group using their expertise within their respective areas to address ICT.
- What we are doing (ICT accessibility goals and strategies): We have three primary goals supported by a wide variety of activities. We have included milestones, barriers, and next steps for each goal.
- Where we are (solutions and statuses): We are committed to transparency and to sharing our progress, plans, and anticipated time frames.

## Section 2: Legal Requirements

### Colorado laws

#### HB21-1110

On June 30, 2021, Colorado's governor signed HB21-1110. This act added language to strengthen the current Colorado law for protection against discrimination against persons with disabilities. This specifically relates to accessibility of government information technology. The added provisions include:

- Prohibiting a person with a disability from being excluded from participating in or being denied the benefits of services, programs, or activities of a public entity or a state agency;
- Clarifying that such prohibition includes the failure of a public entity or state agency to develop an accessibility plan and fully comply, on or before July 1, 2024, with accessibility guidelines established by the OIT.

#### SB23-244

On April 20, 2023, SB23-244 Technology Accessibility Cleanup Bill was approved and became effective. This act:

- Clarifies statutory language to ensure the provision of reasonable accommodations for persons with disabilities;
- Requires the OIT to promulgate rules regarding accessibility standards for an individual with a disability for information technology systems employed by state agencies;
- Clarifies language regarding sanctions for failing to comply with accessibility standards.

## 8 CCR 1501-11

In March 2024, the Governor's OIT finalized the Rules Establishing Technology Accessibility Standards 8 CCR 1501-11. The purpose of the rules is to define the accessibility technical standards and compliance parameters for individuals with a disability for information technology systems. The rules are intended to improve the accessibility and usability of government information technology products and services in Colorado.

The rules apply to all ICT, including both public-facing and internal-facing, that is procured, developed, maintained, or used by public entities and state agencies.

- This ICT includes but is not limited to websites, applications, kiosks, digital signage, digital documents, video, audio, and third-party tools that are owned or controlled by the public entity;
- The rules apply to the components of hardware that transmit information to a user or have a user interface.

## HB 24-1454

On May 24, 2024, the Governor signed House Bill 24-1454, which temporarily postpones liability for public entities that cannot not comply with the OIT Rules Establishing Technology Accessibility Standards, if the public entities demonstrate a good faith effort toward compliance. Beginning on July 1, 2024, public entities could either comply with OIT's rules, or choose to comply with the criteria in HB 24-1454 for one year through July 1, 2025, while they continue their efforts to comply with the OIT rules. There are additional stipulations regarding actions public entities must take during this period.

Platte River chose to comply with the criteria in HB 24-1454 for one year through July 1, 2025, while we continue our efforts to come into compliance with the OIT rules.

## Federal Laws

### Title II of the Americans with Disabilities Act (ADA)

Title II of the ADA requires governments provide people with disabilities equal opportunity to benefit from their programs, services, and activities. The ADA is meant to allow individuals with disabilities to fully participate in all aspects of civic life. In practice, this means that governments must engage in effective communication, provide reasonable modifications or accommodations, facilitate access, and adhere to applicable standards.

### 89 FR 31320 Nondiscrimination on the Basis of Disability; Accessibility of Web Information and Services of State and Local Government Entities

In April 2024, 89 FR 31320 was published. The final rule has specific requirements to make web content and mobile applications (apps) accessible to people with disabilities. The requirements of 89

FR 31320 are very similar to HB 21-1110 and are based on WCAG 2.1 AA standards. The deadline for compliance under 89 FR 31320 for state and local agencies is April 24, 2026.

### Section 508 of the Rehabilitation Act

The Rehabilitation Act of 1973 was amended in 1998 to include accessibility requirements for electronic and information technology (EIT). While Section 508 is applicable only to federal agencies, many governmental entities (including Platte River) have incorporated Section 508 compliance into their own accessibility processes. In addition, recipients of federal funds may have Section 508 specific requirements. In practice, compliance with Title II and HB 21-1110 will typically result in compliance with Section 508. The OIT Rules incorporate the Section 508 requirements into the Colorado accessibility standards.

## Section 3: Organizational approach

### Steering committee

Platte River will create a steering committee with a cross-representation of participants. The steering committee will provide guidance regarding the strategic direction of the digital accessibility program, resource allocation, work priorities, and communications.

### Working groups

Additionally, Platte River will create the following working groups. A defined focus and scope will be established for each working group. Working groups will define and assess the inventories of their respective areas and prioritize ICT. Groups will determine an approach for remediation, modification, or accommodation, and continue to recommend and provide tools, processes, and training that can be used in the remediation of digital assets.

Platte River prioritizes remediation of digital assets based on community usage and will consider the available technical and human resources at a given time. We will be responsive to requests for specific inaccessible ICT and will respond with remediation, modification, or accommodation where resources permit.

The ten (10) working groups, their defined focuses, and scopes are as follows:

- Change management, training and communications
  - Apply change management principles to help people welcome, accept, and execute change.
  - Identify and conduct or acquire digital accessibility training to provide a foundation for Platte River staff to make digital technology accessible, meet standards, and enhance the user experience for everyone.

- Build a culture of accessibility by integrating accessibility into communications for awareness across Platte River.
- Content strategy
  - Design accessible content so that all users can access and interact with the material.
  - Make content accessible by using video captions, audio to error messaging, and color.
  - Improve web pages so that users can easily consume content.
  - Work accessibility into processes so all can benefit from content.
- Contracts and procurement
  - Create standard language for use in ICT contracts.
  - Inventory and prioritize existing ICT contracts.
  - Identify other accessibility requirements for the procurement process.
- Digital signage, kiosks and public tools
  - Make virtual and in-person events and technology digitally accessible.
  - Make provided digital signage, kiosks and other devices accessible and compatible with assistive technologies to include video and audio.
- Accessibility Compliance and Accommodation
  - Oversee website and ICT accessibility audits.
  - Manage accommodation requests.
  - Coordinate quarterly progress report development.
  - Track and respond to user feedback on accessibility barriers.
- Job descriptions
  - Provide guidance, tools, and processes to make job descriptions compliant with digital accessibility standards.
  - Identify job descriptions that need to be updated.
  - Track progress towards compliance.
- Planning
  - Create an accessibility statement.
  - Develop a process for accommodation requests.
  - Create a Platte River digital accessibility plan.
  - Support other working groups' prioritization and remediation efforts.

- Develop a process for tracking progress toward compliance.
- Track and resolve reported issues.
- Policy and procedures
  - Inventory and prioritize policies, processes, and procedures for awareness and digital accessibility compliance.
  - Update practices and procedures to be followed in compliance with legislation.
  - Decide accessibility checkpoints.
  - Work with owners to create and update their departmental policies and procedures.
- Rulemaking review
  - Lead Platte River' participation in OIT's rule development.
  - Comment on potential rule topics by providing constructive input.
  - Comment on draft rules and participate in hearings on proposed rules.
  - Review adopted and posted rules and interpret and summarize those rules to guide Platte River's approach to compliance with the rules.
- Technical tools
  - Identify Platte River-developed and -managed third party applications and owners.
  - Inventory and prioritize applications, infrastructure, and website interfaces with owners.
  - Collaborate with owners to identify and provide tools and resources they need to implement digital accessibility across our platforms.
  - Identify accessibility checkpoints.

## Section 4: ICT accessibility goals and strategies

Platte River's goals and strategies are designed to meet the public's and employees' evolving needs while meeting or exceeding all applicable state and federal requirements. Platte River recognizes, supports, and works to enhance accessibility in all forms, and intentionally seeks inclusive approaches to engage communities around our services. Our ongoing accessibility effort works to make Platte River public meetings and information available to all. Key strategies include:

- **Staff training, awareness, and empowerment:** Every Platte River employee who produces or is responsible for ICT is responsible for compliance. To assist staff with accessibility awareness and successful remediation, Platte River will develop and disseminate resources and training.
- **Procurement guidelines, vendor engagement, and accessibility compliance:** Platte River will update its procurement process and contract reviews to communicate our standards with vendors and partners.

- **Feedback and continuous improvement:** Internal and external communication channels provide continuous feedback loops for receiving and responding to questions and input.
- **Monitoring and reporting:** Platte River is dedicated to monitoring digital equity initiatives. Monitoring allows us to transparently share progress, report on success metrics, and make data-driven decisions.

## Goal 1: Establish ICT priorities

Platte River prioritizes remediation of digital assets based on community usage, considering the technical and human resources available at a given time. We will respond to requests for access to specific inaccessible ICT and will remediate, modify, or make a reasonable accommodation where resources permit.

Platte River will, on a recurring basis, inventory ICT to:

- Prioritize accessibility testing and remediation. This effort will be based on:
  - OIT guidelines and recommendations for prioritization
  - Community impact and usage data
  - Legal requirements
  - Organizational capacity and limitations
- Track accessibility compliance, where applicable, based on:
  - Automated testing
  - Manual testing
  - Vendor-supplied documentation (such as VPATs)
  - Information received on the [Digital Accessibility Request Form](#) and documented resolutions
- Milestones
  - Complete ICT inventory by September 1, 2025
  - Prioritize high traffic websites and documents by December 1, 2025
- Barriers
  - Legacy systems incompatible with WCAG 2.1 AA
  - Limited staffing for remediation
- Next steps
  - Secure vendor support for remediation

- Implement automated testing tools

## **Goal 2: Establish expectations around compliance**

Platte River will make all employees aware, through training and communications, of their responsibilities about work products and acquired ICT that must meet or exceed accessibility standards. Platte River will:

- Provide digital accessibility information, training, and support
- Evaluate and procure accessibility tools to help employees be successful
- Implement automated tools and manual testing
- Establish mechanisms for users to provide feedback on the accessibility of ICT solutions; use feedback to identify and address accessibility barriers
- Milestones
  - January 2026: Develop resources that will be made available to all staff, followed by scheduling dates to host trainings
  - March 2026: Staff to complete available trainings
  - March 2026: Implement automated accessibility testing
- Barriers
  - Limited internal expertise
- Next steps
  - Procure external training resources
  - Document accessibility checkpoints in development workflows

## **Goal 3: Expand accessibility expertise**

Expanding digital accessibility awareness within Platte River is crucial for fostering an inclusive environment that accommodates all individuals, including those with disabilities. By enhancing our understanding and implementation of accessibility standards, we comply with legal requirements and demonstrate a commitment to equal access. These efforts support making our digital content and services usable by audiences of varying abilities. Platte River aims to increase accessibility awareness by recruiting and hiring employees dedicated to supporting accessibility initiatives, and providing additional training, tools, and resources to existing employees. Platte River strives to empower all employees to become accessibility advocates.

- Milestones
  - Identify an accessibility coordinator by August 2025



- Identify accessibility training resources for all departments by March 2026
- Barriers
  - Need more internal knowledge and expertise for accessibility roles
- Next steps
  - Partner with consultants for interim expertise
  - Leverage existing accessibility training resources (for example, WebAIM)

## Section 5: Solutions and statuses

Platte River is currently auditing, testing, and remediating a wide variety of ICT. Platte River has developed and maintained its websites to meet the current web accessibility standards (WCAG 2.1, AA) and industry best practices.

- Websites
  - EfficiencyWorks.org was redesigned to focus on enhancing navigation, page load times, and the accessibility of widgets, code, and content.
  - PRPA.org has been reviewed by Platte River’s vendor accessibility team. This team has been transparent about accessibility improvements and has made recommendations to improve accessibility on this website. Platte River staff is currently working on making these improvements.
  - In December 2025, the assigned working group will convene with the vendor accessibility team to assess Platte River’s compliance status with WCAG 2.1 AA, receive and update on VPAT status, and collaborate on a unified accessibility roadmap for achieving WCAG 2.2 Level AA.
- Vendor progress
  - Platte River is actively engaging with a vendor accessibility team to obtain accessibility documentation (e.g. VPATs) and require accessibility remediation where applicable.
- Document review

Platte River hosts approximately 80 PDFs on the EfficiencyWorks.org website and approximately 700 on the PRPA.org website. Of these, we are focusing our remediation efforts on the high-priority documents.

- An accessibility audit of all public-facing PDFs and digital documents is underway, with high-priority documents scheduled for remediation by December 1, 2025.
- A more detailed timeline of PDF remediation efforts will be published in December 2025. This will include efforts on hosting PDF remediation training sessions to equip Platte River’s web contributors with the necessary skills and knowledge to perform remediation tasks effectively.

- Organization-wide, we are developing accessible templates, such as Word documents and presentations, so documents are created with accessibility in mind rather than relying on retroactively remediating documents.