CREATIVE INFORMATION TECHNOLOGY, INC.

Accessibility Standards & Guidelines Policy

Version 1.2

ISO 9001 QUALITY MANAGEMENT

ISO 20000-1 IT SERVICE MANAGEMENT

ISO 27001 INFORMATION SECURITY MANAGEMENT

CMMI ML5 APPRAISED DEV VRT

CMMI ML3 APPRAISED SVC VRT

Document Owner

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DOCUMENT CONTROL TABLE

This page provides CI (Continuous Improvement) information related to document version control, including authorization before this document is released for production use.

Document Name: Accessibility Standards & Guidelines Policy				
Service Desk Request #	**Change Description**	**Changed/ Created By**	**Version #**	**Date Authorized**
RE-34592	--	UI/UX Design & Accessibility Teams	1.0	07/12/2022
RE-61592	Process Section Updated. ADA Compliance Added.	UI/UX Design & Accessibility Teams	1.1	11/17/2023
RE-73566	Updated Contact Information.	UI/UX Design & Accessibility Teams	1.2	04/21/2025

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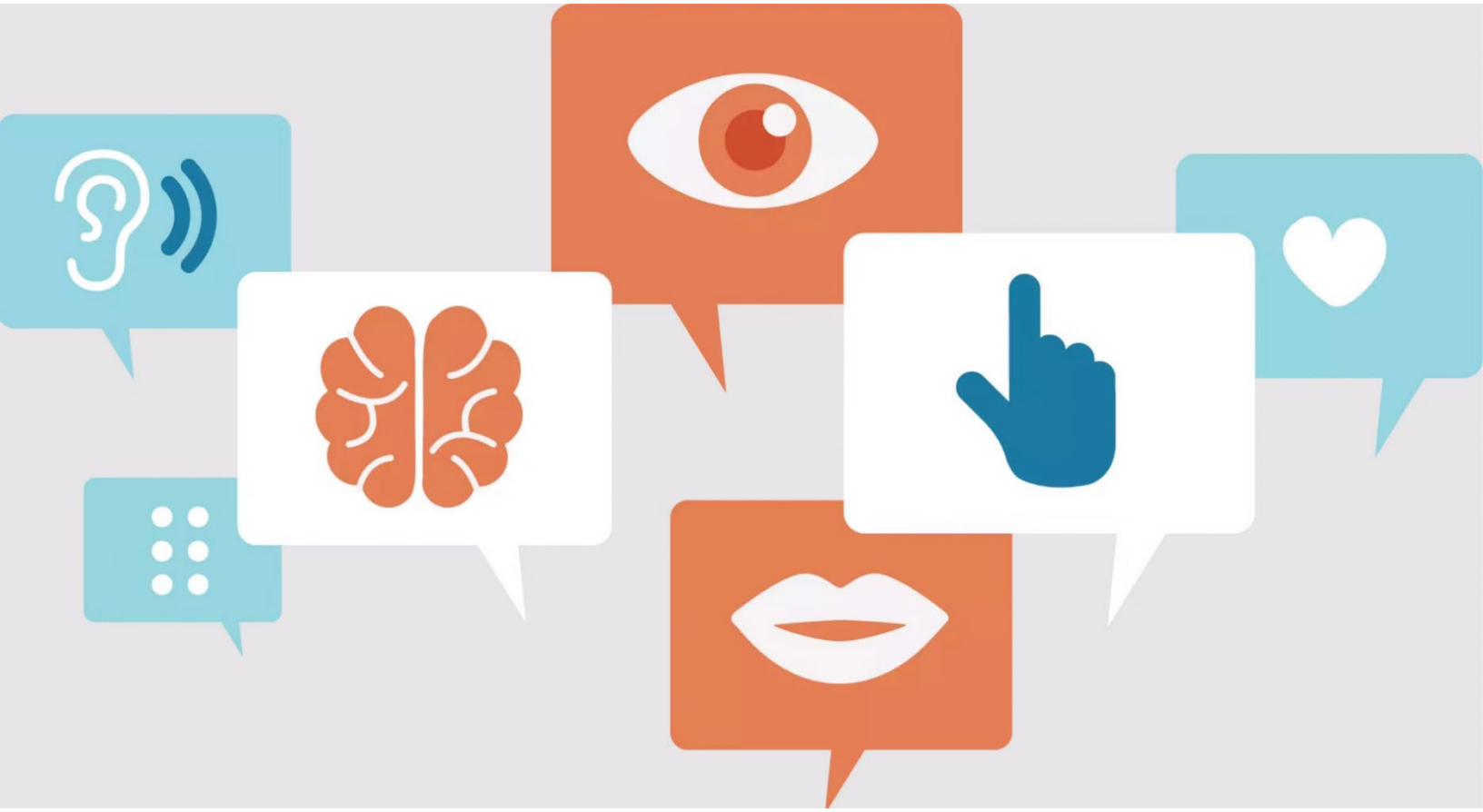
1. INTRODUCTION



We believe that the exceptional user experiences we create should be accessible to everyone, regardless of their abilities or circumstances. Accessibility is not just a feature; it's a fundamental value that guides our design and development processes. We are committed to creating inclusive digital environments where all users can engage fully and independently.

By prioritizing accessibility in UX, we ensure that our products are intuitive, equitable, and empowering for all individuals. We strive to be leaders in the industry by continuously learning, adapting, and implementing best practices in accessibility, ensuring that our commitment to social responsibility is reflected in every aspect of our work. To ensure that all our product and solution offerings meet the highest standards of accessibility compliance, we actively prioritize the needs of all users, including those with disabilities, by integrating accessibility best practices into every stage of our design, development, and testing processes. Our promise is to provide inclusive and equitable digital experiences, adhering to recognized accessibility guidelines and continuously improving our offerings to serve a diverse audience.

2. ACCESSIBILITY GOALS

GOAL #1

To make our product and solutions content and functionality accessible to users with a wide range of disabilities such as:

Hearing Impairment	Visual impairment
Motor impairment	Cognitive Barriers (Dyspraxia, Dyslexia, Dyscalculia, & Dysgraphia)

GOAL #2

Follow WCAG's POUR: Principles of Accessibility to ensure that users with disabilities can Perceive, Operate, Understand, and interact with Robust interfaces (P.O.U.R.) across various devices to access digital content effectively.

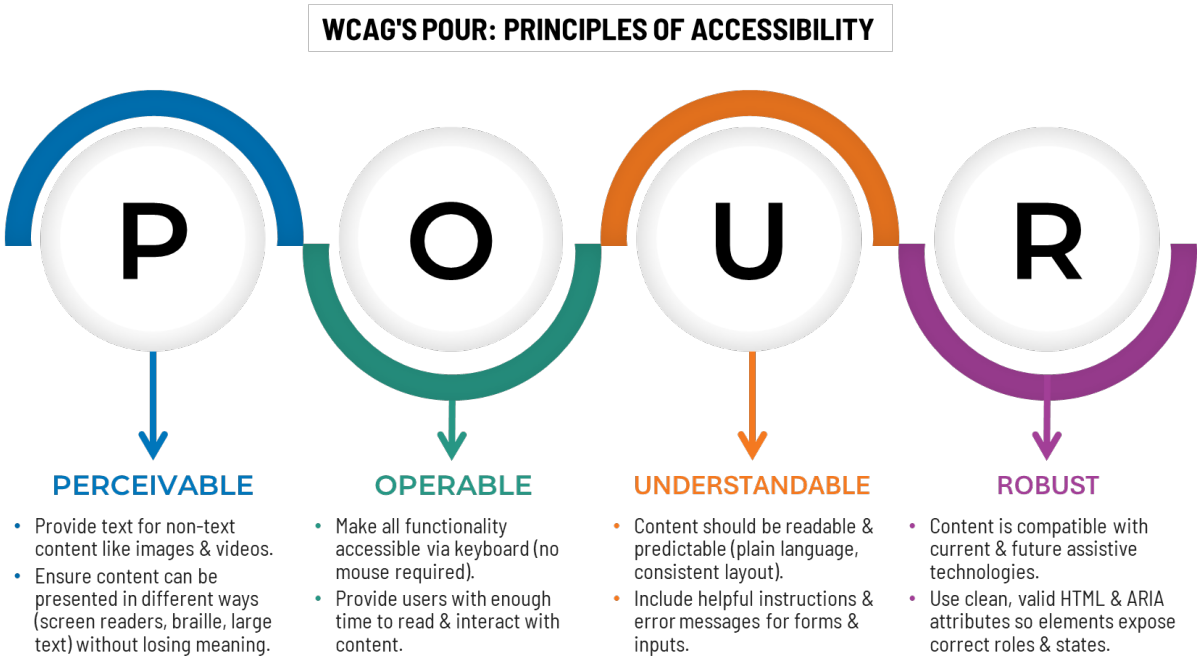


Figure 1: WCAG's POUR: Principles of Accessibility

GOAL #3

To make content and functionality accessible to users using key accessibility features such as:

	Alternative Text for Images (Alt Text)		Consistent Navigation & Layout
	Keyboard Navigation		Accessible Forms
	Screen Reader Compatibility		ARIA (Accessible Rich Internet Applications) Landmarks & Roles
	Color Contrast		Error Handling and Feedback
	Legible & Resizable Text		Responsiveness across Devices & Browsers

3. LEGAL & REGULATORY COMPLIANCE

To evaluate and enable the accessibility of web applications in compliance with legal and standards frameworks such as:

WCAG 2	The Web Content Accessibility Guidelines (WCAG) are a set of international standards developed by the World Wide Web Consortium (W3C) to make web content more accessible to people with disabilities. These guidelines provide a comprehensive framework for designing and developing web content that is Perceivable, Operable, Understandable, and Robust (POUR). The Department of Justice's Americans with Disabilities Act refers to WCAG, Level AA, as recommended accessibility compliance standards.
SECTION 508	Section 508 of the Rehabilitation Act of 1973 mandates that federal agencies ensure their electronic and information technology is accessible to people with disabilities. This law applies to all federal government entities and contractors, requiring them to create, procure, and maintain accessible technology, including websites, software, and electronic documents.
ADA COMPLIANCE	The Americans with Disabilities Act (ADA) is a landmark civil rights law enacted in 1990 to prevent discrimination against individuals with disabilities in various areas of public life, including employment, transportation, public accommodations, and communications. ADA accessibility compliance refers to the legal requirements businesses and organizations must meet to ensure their facilities, services, and digital content are accessible to people with disabilities.

4. ACCESSIBLE COMPLIANCE PROCESS

Our accessibility compliance processes are integrated into our overarching web application design and development process which consists of 5 main phases illustrated below:

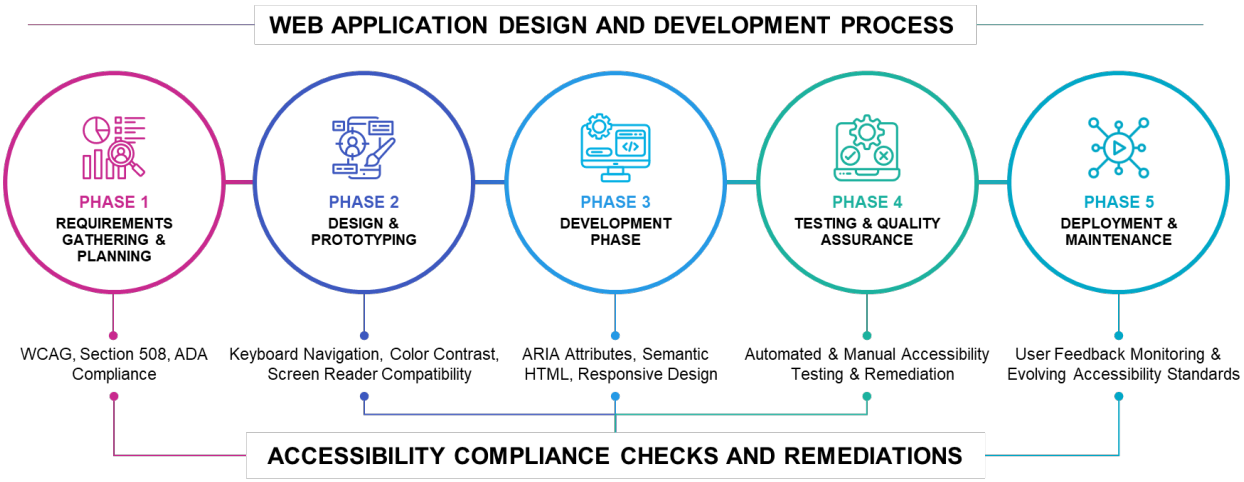


Figure 2: Accessibility Compliance Process Integrated within CITI's Web Application Design & Development Lifecycle

The following accessibility tasks, checks, and remediations are carried out in each phase:

- **Phase 1: Requirement Gathering & Planning:** Define accessibility requirements based on WCAG (Web Content Accessibility Guidelines), Section 508 compliance, and ADA Compliance (Americans with Disabilities Act).
- **Phase 2: Design & Prototyping Phase:** Incorporate accessible UI/UX design principles, ensuring keyboard navigation, color contrast, and screen reader compatibility.
- **Phase 3: Development Phase:** Implement ARIA (Accessible Rich Internet Applications) attributes, semantic HTML, and responsive design, and even AI-driven NLP/NER multilingual services for greater accessibility.
- **Phase 4: Testing & Quality Assurance:** Conduct manual accessibility testing using tools like ANDI, WAVE, JAWS, or NVDA screen readers. Conduct automated accessibility testing using QualiBooth Accessibility Toolkit or Accessibility Checker. Check language and spellings using Grammarly or Typosaur.
- **Phase 5: Deployment & Maintenance:** Ensure continuous monitoring and updates based on user feedback and evolving accessibility standards.

5. THE ACCESSIBILITY TEAM

At CITI we believe that our accessible products and solutions offerings require a multidisciplinary team equipped with specialized skills supported by structured training. Developers, designers, testers, business analysts, product owners, and project managers must all be knowledgeable about inclusive design and regulatory compliance. We emphasize building internal capability while also leveraging expert third-party resources to maintain excellence in accessible and compliant web application delivery.

5.1 Skills Required

CITI's accessibility team is proficient in both the technical and human-centered aspects of accessibility and integrating accessibility checks, QA, and bug reporting into CI/CD (Continuous Integration/Continuous Development) pipelines. Our team of experts are experienced, knowledgeable, and skilled in:

1. Accessibility Standards	
	• Web Content Accessibility Guidelines (WCAG 2.1/2.2). • Section 508. • The Americans with Disabilities Act (ADA).
2. Inclusive UX/UI Design & Development	
	• ARIA Roles and Attributes, Semantic HTML, Accessible JavaScript, Clean CSS. • Keyboard Accessibility, Focus Indicators, Skip Navigation, Screen Reader-Friendly Markup. • Color Contrast, Responsive Design, Text Scaling, Consistent Navigation, Form Labels.
3. Accessibility Testing and QA	
	• Manual Accessibility Testing - ANDI, WAVE, NVDA screen readers. • Automated Accessibility Testing - QualiBooth Accessibility Toolkit, Accessibility Checker. • Language Check - Grammarly, Typosaur. • Bug Reporting – JIRA and DevOps Bug Reporting.
4. Accessibility Lifecycle Governance	
	• Test Cases, User Stories, Sprint Planning, Definition of Done (DoD). • Monitoring Compliance Checkpoints throughout the Software Development Lifecycle (SDLC). • Creating and maintaining documents such as VPATs, Test Cases, Accessibility Checklists, etc. • Post-Deployment User Feedback Analysis and Enhancement of Accessibility Features.

5.2 Accessibility Team Structure

For every web application development or website development project, CITI assembles a team of accessibility experts that fit the profile from our talented resource pool. The diagram below illustrates the broad-level constituents and hierarchy of the accessibility team and demonstrates the interactions with other teams involved in application development:

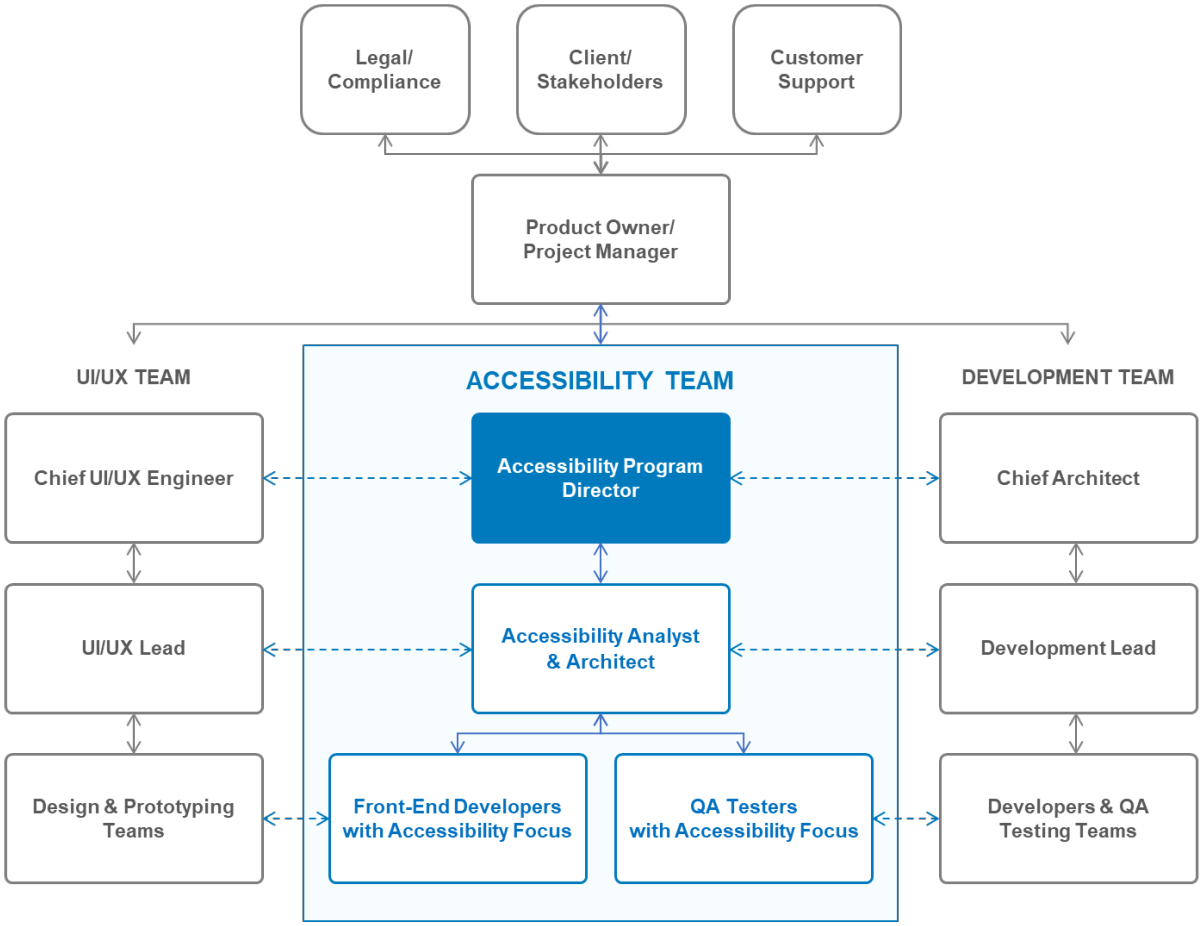


Figure 3: Accessibility Team Structure & Cross-Functional Interactions with other Teams

5.3 Roles & Responsibilities

A brief summary of the roles and high-level responsibilities of the accessibility team are defined below:

Title	**Accessibility Program Director**
Role	Oversee the overall accessibility strategy, execution, quality, and governance.
Responsibilities	• Define accessibility goals and KPIs (Key Performance Indicators) across projects. • Coordinate efforts between departments (Development, Design, Product Owner/s, QA, Legal, etc.). • Ensure alignment with regulatory requirements (WCAG, Section 508, ADA). • Evolve accessibility compliance based on user feedback. • Define coding standards and architectural patterns for accessibility. • Organize internal workshops and brown bags.

	• Manage learning paths of team members.
Title	**Accessibility Analyst & Architect**
Role	Provides high-level technical leadership and guidance on accessibility implementation.
Responsibilities	• Review UI/UX wireframes for accessibility gaps. • Ensure accessible color contrast, keyboard flow, layout and Alt Text strategies. • Conduct deep technical audits and recommend solutions. • Mentor developers on ARIA use, semantic structure, and complex interactions. • Select and manage execution of accessibility tools and supervise bug-reporting and fixing. • Conduct usability testing with people with disabilities. • Maintain internal documentation, style guides, and checklists.
3. Front-End Developers with Accessibility Focus	
Role	Implement accessibility best practices in code.
Responsibilities	• Write code for semantic HTML, keyboard-navigable interfaces, and responsive designs. • Integrate ARIA labels, attributes, roles, and live regions. • Use and extend accessible component libraries. • Respond to support tickets related to accessibility.
4. QA Testers with Accessibility Focus	
Role	Validate accessibility compliance through manual and automated testing.
Responsibilities	• Use screen readers such as ANDI/WAVE/JAWS, voice input tools, and keyboard-only testing. • Run automated scans using tools like QualiBoost/Accessibility Checker. • Check language and spellings using Grammarly and Typosaur. • Write accessibility test cases and track defects. • Log and escalate bugs or non-compliance issues.

5.4 Additional Resources

Additional resources such as Content Creators can be utilized to improve and simplify the language, create clear instructional text, provide alt text, and ensure content accessibility. External Vendors can also be used to create and complete VPATs or VADSIR documentation as needed.

5.5 Training Methods

To stay current with evolving standards and tools, the training provided by CITI is continuous, practical, and supported by both internal and external resources. Listed below are some approaches that we adopt to keep our resources updated on the latest tools, technologies, and regulatory laws:

1. Internal Training Programs & Workshops	
	• Assistive Technology Familiarization - Screen Readers, Keyboard Navigation Emulators, Color Contrast Analyzers, Manual and Automated Accessibility Testing Tools. • Hands-on Simulations to Improve Understanding of Inclusive Design.
2. Peer/Group Review Sessions	
	• Code Review Sessions. • Accessibility Documentation & Reporting. • Group Discussions on Use Cases, Emerging Trends, and Evolution of Accessibility Standards.
3. External Courses & Certifications	
	• Tutorials and Courses available on Lynda.com, WebAIM, and W3C WAI. • Currently pursuing IAAP Certifications – such as Certified Professional in Accessibility Core Competencies (CPACC) and Web Accessibility Specialist (WAS).
4. Professional Community Forums and Events	
	• Subscribing to Accessibility Forums and Mailing Lists - to Stay Updated on Regulatory Changes & Emerging Tech & Tools such as use of AI in Accessibility Compliance and WCAG 3. • Attending Conferences – such as the CSUN Assistive Technology Conference and Axe-con (Deque University).

6. ACCESSIBILITY TESTING TOOLS

The following tools are used to evaluate accessibility compliance for our products and solutions offerings:

6.1 Manual Compliance Testing Tools

ANDI **ANDI: Accessible Name & Description Inspector**	**ANDI Accessibility Testing Tool is CITI's preferred tool for manual accessibility testing.** It is a free browser-based accessibility testing tool developed by the U.S. Social Security Administration. It helps web developers, designers, and testers identify accessibility issues on web pages by highlighting elements with missing or incorrect

	accessible names, descriptions, and other key attributes. For more details visit: ANDI - Accessibility Testing Tool
JAWS: Job Access With Speech	JAWS is a popular screen reader for Windows application that enables visually impaired users to navigate and interact with web and desktop applications using speech or Braille output. It's widely used for accessibility testing to ensure content is perceivable and operable through keyboard navigation and screen reader output. For more details visit: JAWS® – Freedom Scientific
WAVE: Web Accessibility Evaluation Tool	WAVE is a free web accessibility evaluation tool developed by WebAIM that identifies accessibility issues directly within web content. It highlights errors, alerts, and features using a visual overlay, helping developers and designers ensure compliance and improve usability for users with disabilities. For more details visit: WAVE Web Accessibility Evaluation Tools
NVDA: Non-Visual Desktop Access	NVDA is a free, open-source screen reader for Windows that enables blind and visually impaired users to interact with applications using keyboard commands and speech output. ("Accessibility Testing: Definition, Types, Metrics & Examples — aqua cloud") It's widely used for accessibility testing to verify web and software compatibility with screen reader technologies. For more details visit: NV Access

6.2 Automated Compliance Testing Tools

QualiBooth: Accessibility Toolkit	**QualiBooth Accessibility Toolkit is CITI's preferred tool for automated accessibility testing.** It is a cloud-based accessibility testing platform that scans web applications for compliance and provides real-time reports, issue tracking, and remediation guidance, helping teams identify and fix accessibility issues efficiently throughout the development lifecycle. For more details visit: Qualibooth Accessibility Toolkit
Accessibility Checker: Accessibility Testing Platform	Accessibility Checker is a free online tool that evaluates websites for accessibility compliance by scanning for issues, providing detailed reports highlighting errors, warnings, and recommendations, helping developers improve usability for individuals with disabilities and ensure digital content meets accessibility standards. For more details visit: Accessibility Checker

7. TEST CASES

Accessibility test cases are specific, repeatable checks or scenarios used during QA to verify that a website, application, or digital product meets accessibility standards like WCAG 2.1, Section 508, or the ADA.

7.1 Test Measures

Here are some of the accessibility features along with pre-defined objectives and expected results that are typically used during compliance checks:

Accessibility Features	Objectives	Expected Results
Alt Text for Images	Ensure screen readers can read the Alt Text descriptions for all images/icons.	Screen readers read and convey meaningful image descriptions to users.
Keyboard Navigation	Ensure users can navigate the application using just the keyboard.	Users can navigate all interactive elements and menus of the application interface using Tab/Enter without having to use the mouse.
Color Contrast	Ensure there is enough contrast between the content and background colors to allow visibility for users with low vision.	Color Contrast Analyzer meets 4.5:1 ratio for normal text and 3:1 for large text as per WCAG Level AA requirements.
Form Field Labels	Help users understand, navigate, and enter information in forms.	Screen reader correctly identifies Form Field Labels and provides instructions to make it easier for users to fill up forms.
Shortcut Keys	Help users avoid multiple clicks and efficiently navigate the application interface using keyboard shortcuts.	Users can avoid repetitive mouse clicks and use keyboard shortcuts to navigate the application.
Responsive Design & Devices	Validate accessibility compatibility on different devices, OS environments, and browsers.	The web application responsive layout works well across all device types - PCs (Windows & Mac), Mobiles and Tablets (iOS, Windows, & Android), and across various browsers (Chrome, Firefox, & Edge).
Response Time	Ensure that users relying on assistive technologies don't face delays or timeouts.	All interactive elements respond within acceptable time frames (under 2 seconds), with no timeout issues.
Audio/Video Content Features	Ensure audio/video content is accessible and perceivable to	All media includes captions, transcripts, and keyboard-accessible

	users with hearing or visual impairments.	controls. Audio descriptions are available when needed.
Help & Support	Verify accessible access to technical and user support resources.	Help content is reachable via keyboard, screen-reader friendly, and support options (chat, phone, email) are clearly described.
User Documentation	Ensure that manuals, tutorials, and guides are accessible to all users.	Documentation is available in accessible formats (HTML, tagged PDFs), supports screen readers, and follows plain language guidelines.

7.2 Test Case Template

To use this template, copy the table below into a new Word document or Excel sheet, as per the project requirements:

Project Name:	**Date:**
Test Case ID:	
Test Application	
Test Subject URL:	
Test Type:	
Objective	
Requirement	
Priority	
Preconditions	
Main Menu Items:	
Assistive Tool Used:	
Test Steps	
Expected Result	
Actual Result	
Conclusion	
Recommendations	
Notes:	
Verdict	
Tested By	
Test Date	

7.3 Test Case Example

Arise Care Test Case Report April 27, 2024

Test Case ID:	ALCMS-KB-004
Test Application	Alabama Arise Childcare CMS (Case Management System) Portal
Test Subject URL:	https://al-arise-qa-main.citigovcloud.com//Account/Login?ReturnUrl=%2F
Test Type:	Keyboard Navigation of Interactive Elements and Menus
Objective	Verify that users can access and navigate the application using only a keyboard (no mouse).
Requirement	WCAG 2.1 – Success Criterion 2.1.1: Keyboard (A)
Priority	High
Preconditions	The web application is loaded in a browser (Chrome/Firefox) with JavaScript enabled.
Main Menu Items:	Home, Profile, Payments, Documents, Facility Applications, Subsidy Applications, Scheduler, My Profile, Home (Logo)
Assistive Tool Used:	Keyboard only (Tab, Arrow keys, Enter, Spacebar, Esc), ANDI
Test Steps	1. Load the homepage. 2. Press Tab repeatedly until the first main menu item is focused. 3. Use Tab or Arrow Right to move to the next menu item. 4. Press Enter on the Main Menu buttons to navigate to that section 5. Use Arrow Down to navigate through submenu items. 6. Press Enter to select a submenu item. 7. Press Esc to exit the menu. 8. Continue tabbing to confirm that focus moves beyond the menu.
Expected Result	• Focus is visibly outlined on all menu and submenu items. • Navigate submenus using Arrow Down/Up key. • Menu links are actionable using Enter. • Esc closes any open menus/pop-ups. • No keyboard trap (focus can move past the menu).
Actual Result	• Focus was visible on all main menu items. • Pressing Enter on the Main Menu buttons navigated to that section • Arrow keys allowed smooth navigation of submenu items. • Esc moved the navigation away from the submenu to the main menu. • Focus successfully moved to the next content area on tabbing.
Conclusion	Test passes if all expected results are met without requiring a mouse.
Recommendations	Recommend adding aria-haspopup with enumerated value dialog to indicate the element can trigger a popup and what kind of popup will be displayed.
Notes:	NA
Verdict	**PASS**
Tested By	Anup Mahajan, Software Test Engineer
Test Date	Nov 10, 2024

1

Figure 4: Screenshot of a Test Case Report for Arise Childcare Portal validating Keyboard Navigation

8. CORRECTIVE ACTIONS WORKFLOW

A well-defined corrective action process ensures that accessibility issues are not only documented but also tracked, prioritized, resolved, and verified effectively. Here's CITI's corrective actions workflow, along with the tools and systems typically used:

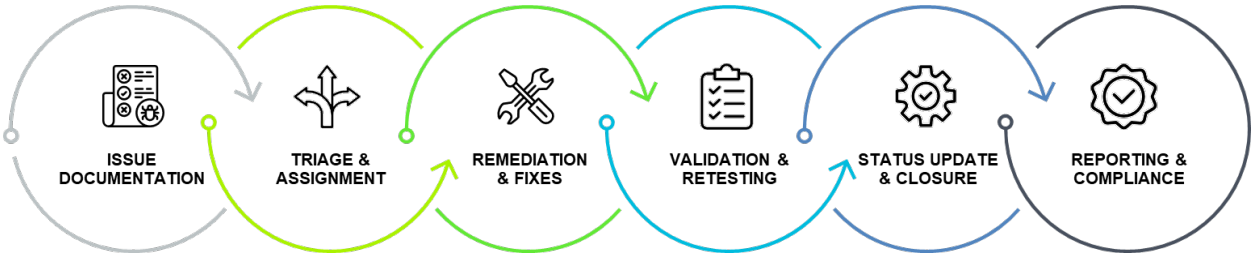


Figure 5: CITI's Corrective Actions Workflow

Details on activities carried out during each phase of the workflow are listed below:

- **Issue Documentation:** Log each issue detected along with severity, WCAG reference, and screen location using tools such as Jira, Azure DevOps, Bugzilla. Exportable Excel or CSV reports from automated testing tools can be attached.
- **Triage & Assignment:** Categorize issues by severity (e.g., high/critical, moderate, low), impact on users, and WCAG conformance level (A, AA, AAA). Assign each issue to the appropriate developer or designer responsible for the component or feature to sprints or epics with due dates using Jira workflows, DevOps or backlog grooming tools.
- **Remediation & Fixes:** Developers apply code-level fixes (e.g., add ARIA labels, alt text, fix tab order, correct color contrast) using code repositories (e.g., GitHub, GitLab, Bitbucket) with pull requests referencing issue IDs.
- **Validation & Retesting:** QA testers re-run accessibility checkers on the remediated sections and validate using assistive tools (e.g., keyboard, screen reader).
- **Status Update & Closure:** If issue passes all tests, mark as "Resolved" or "Closed." If not, reassign for further refinement using the tracking system.
- **Reporting & Compliance:** Generate periodic reports based on post-launch user feedback for internal audits or compliance submissions using Jira or custom Excel/PDF reports. Maintain a central Accessibility Issue Register (e.g., Confluence page or shared spreadsheet). Conduct monthly accessibility review meetings to discuss backlog, risk, and mitigation progress.

9. MANUAL TESTING USING ANDI ACCESSIBILITY TESTING TOOL

For documentation purposes, we have used the example of manual accessibility testing of Arise Care Childcare Management Portal.

9.1 Overview of ANDI

ANDI allows front-end developers, testers, and designers to manually check for accessibility non-compliance on each screen and UI element. It works with various browsers as a bookmark and once it's launched it docks itself on top of the browser window and automatically detects

every accessibility issue found on the application screen and provides suggestions to remedy those issues. Testers need to analyze each page individually as ANDI does not provide a comprehensive accessibility audit/report for entire applications.

Here's a look at the ANDI interface:

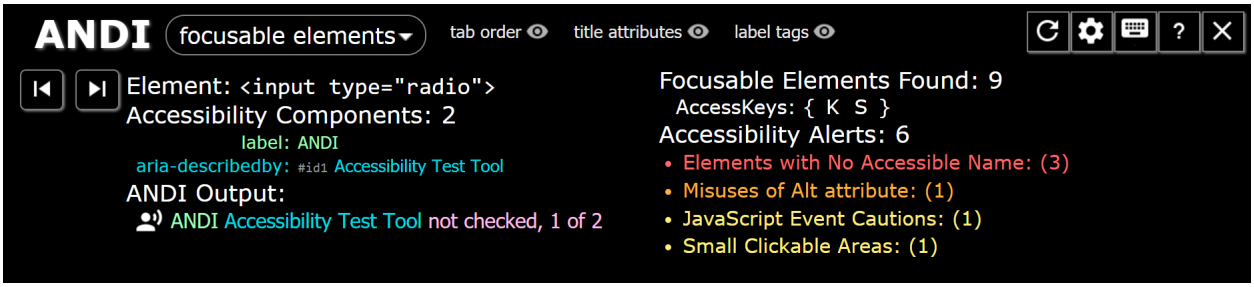


Figure 6: Interface of ANDI Accessibility Testing Tool

This is how ANDI docs on top of the browser window:

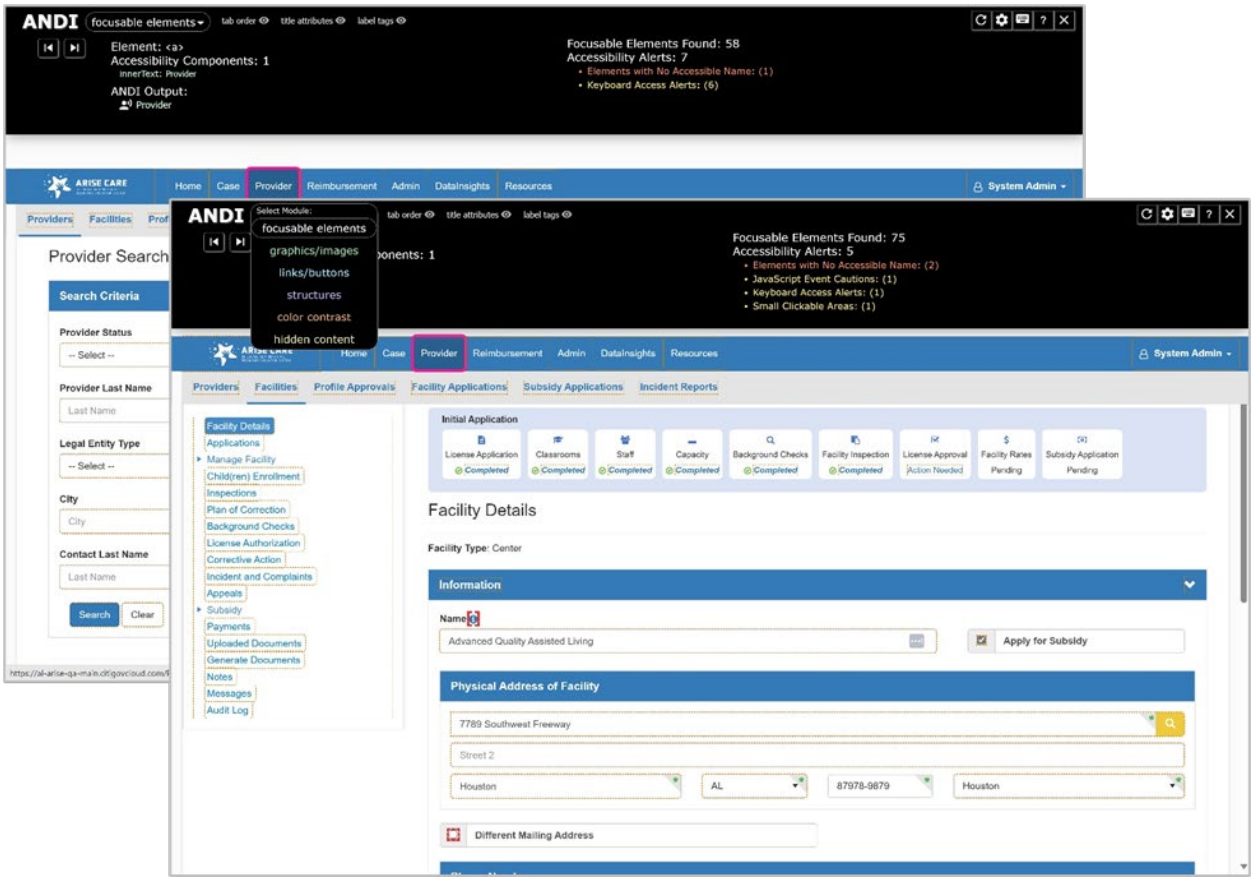


Figure 7: ANDI Accessibility Testing Tool Displaying Accessibility Issues

ANDI splits accessibility testing into smaller modules. When a module Is selected from the dropdown, ANDI re-scans the page and displays all accessibility issues that need attention categorized by the modules demonstrated below.

Here is a list of modules that ANDI checks for accessibility issues:

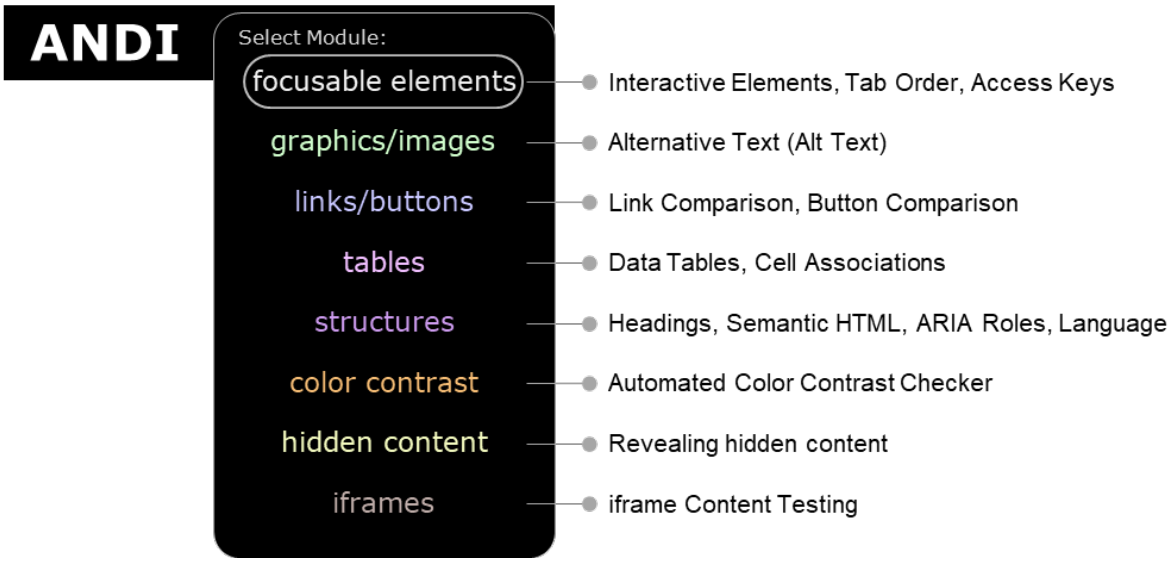
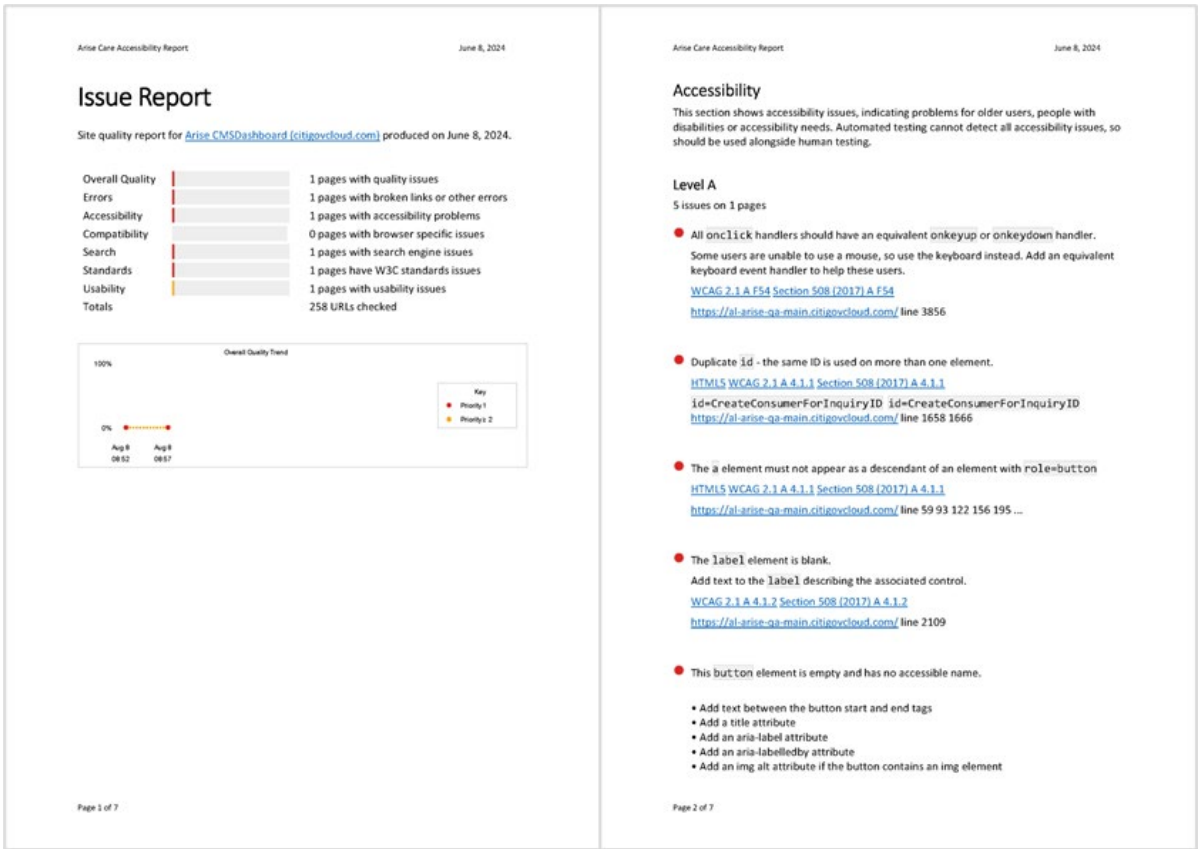


Figure 8: Modules of ANDI Accessibility Testing Tool

9.2 Accessibility Issues Documentation

We analyzed the Arise Care Childcare Management Portal web application using ANDI in the initial testing phase. All the alerts were captured manually in one single report, as ANDI does not generate a comprehensive report. These issues were then organized into various categories such as Accessibility, Browser Compatibility, Standards, Usability, etc. and tagged with the level of severity/priority. Here are some screenshots of a sample report for Arise Care:



Arise Care Accessibility Report June 8, 2024

Issue Report

Site quality report for Arise CMSDashboard (citigovcloud.com) produced on June 8, 2024.

Overall Quality	1 pages with quality issues
Errors	1 pages with broken links or other errors
Accessibility	1 pages with accessibility problems
Compatibility	0 pages with browser specific issues
Search	1 pages with search engine issues
Standards	1 pages have W3C standards issues
Usability	1 pages with usability issues
Totals	258 URLs checked

Overall Quality Trend

100%

0%

Key

Priority 1

Priority 2

Aug 8 08:52

Aug 8 08:57

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Arise Care Accessibility Report June 8, 2024

Accessibility

This section shows accessibility issues, indicating problems for older users, people with disabilities or accessibility needs. Automated testing cannot detect all accessibility issues, so should be used alongside human testing.

Level A

5 issues on 1 pages

- All `onclick` handlers should have an equivalent `onkeyup` or `onkeydown` handler.
  Some users are unable to use a mouse, so use the keyboard instead. Add an equivalent keyboard event handler to help these users.
  WCAG 2.1 A F54 Section 508 (2017) A F54
  https://al-arise-qa-main.citigovcloud.com/ line 3856

- Duplicate `id` - the same ID is used on more than one element.
  HTML5 WCAG 2.1 A 4.1.1 Section 508 (2017) A 4.1.1
  `id=CreateConsumerForInquiryID id=CreateConsumerForInquiryID`
  https://al-arise-qa-main.citigovcloud.com/ line 1658 1666

- The `a` element must not appear as a descendant of an element with `role=button`
  HTML5 WCAG 2.1 A 4.1.1 Section 508 (2017) A 4.1.1
  https://al-arise-qa-main.citigovcloud.com/ line 59 93 122 156 195 ...

- The `label` element is blank.
  Add text to the `label` describing the associated control.
  WCAG 2.1 A 4.1.2 Section 508 (2017) A 4.1.2
  https://al-arise-qa-main.citigovcloud.com/ line 2109

- This `button` element is empty and has no accessible name.
  - Add text between the button start and end tags
  - Add a title attribute
  - Add an aria-label attribute
  - Add an aria-labelledby attribute
  - Add an img alt attribute if the button contains an img element

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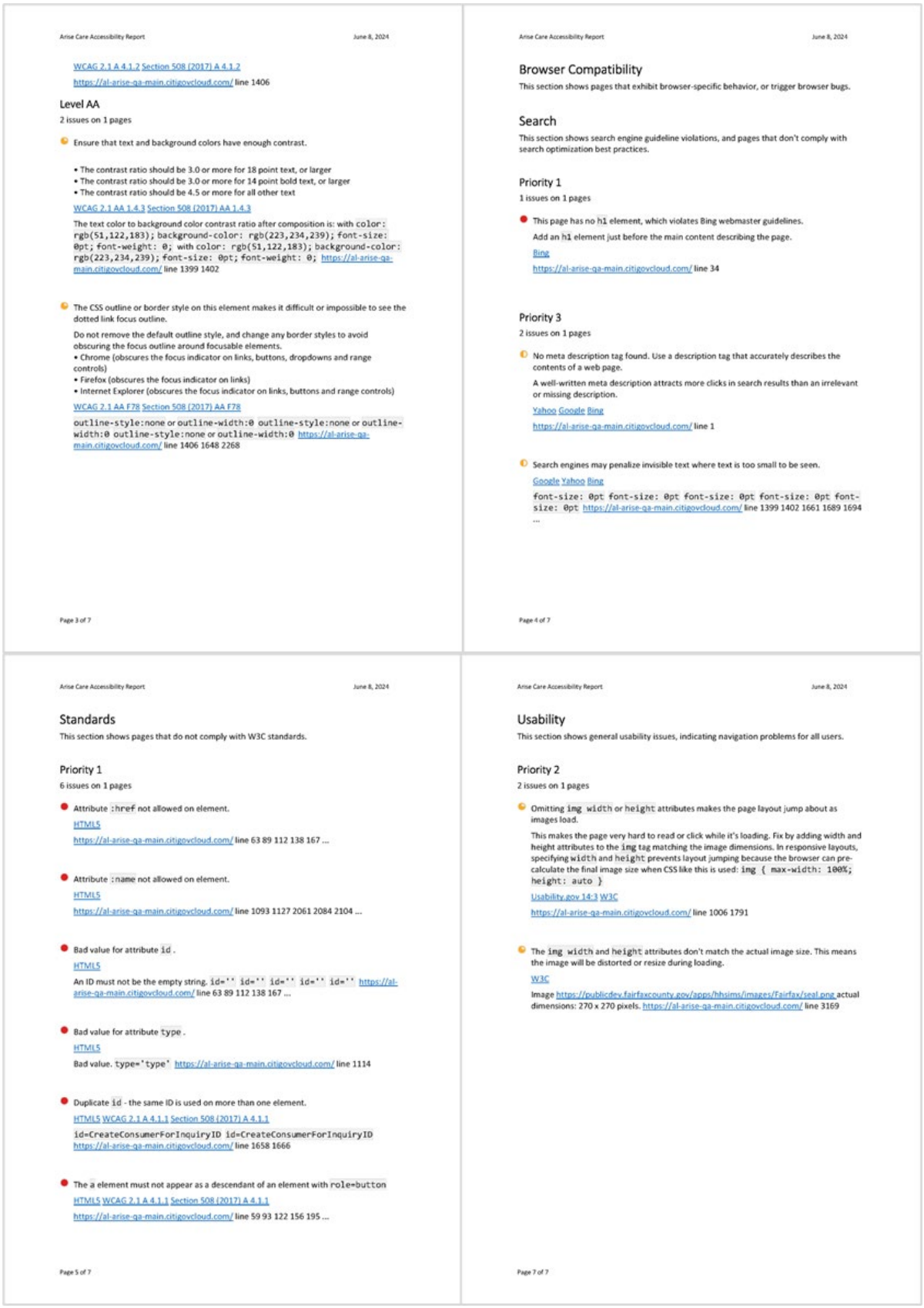

Arise Care Accessibility Report June 8, 2024

WCAG 2.1 A 4.1.2 Section 508 (2017) A 4.1.2
https://al-arise-qa-main.citigovcloud.com/ line 1406

Level AA
2 issues on 1 pages

Ensure that text and background colors have enough contrast.

- The contrast ratio should be 3.0 or more for 18 point text, or larger
- The contrast ratio should be 3.0 or more for 14 point bold text, or larger
- The contrast ratio should be 4.5 or more for all other text

WCAG 2.1 AA 1.4.3 Section 508 (2017) AA 1.4.3

The text color to background color contrast ratio after composition is: with `color: rgb(51,122,183); background-color: rgb(223,234,239); font-size: 0pt; font-weight: 0;` with `color: rgb(51,122,183); background-color: rgb(223,234,239); font-size: 0pt; font-weight: 0;` https://al-arise-qa-main.citigovcloud.com/ line 1399 1402

The CSS outline or border style on this element makes it difficult or impossible to see the dotted link focus outline.

Do not remove the default outline style, and change any border styles to avoid obscuring the focus outline around focusable elements.
- Chrome (obscures the focus indicator on links, buttons, dropdowns and range controls)
- Firefox (obscures the focus indicator on links)
- Internet Explorer (obscures the focus indicator on links, buttons and range controls)

WCAG 2.1 AA F78 Section 508 (2017) AA F78

`outline-style:none` or `outline-width:0` `outline-style:none` or `outline-width:0` `outline-style:none` or `outline-width:0` https://al-arise-qa-main.citigovcloud.com/ line 1406 1648 2268

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Arise Care Accessibility Report June 8, 2024

Browser Compatibility

This section shows pages that exhibit browser-specific behavior, or trigger browser bugs.

Search

This section shows search engine guideline violations, and pages that don't comply with search optimization best practices.

Priority 1

1 issues on 1 pages

This page has no `h1` element, which violates Bing webmaster guidelines.

Add an `h1` element just before the main content describing the page.

Bing

https://al-arise-qa-main.citigovcloud.com/ line 34

Priority 3

2 issues on 1 pages

No meta description tag found. Use a description tag that accurately describes the contents of a web page.

A well-written meta description attracts more clicks in search results than an irrelevant or missing description.

Yahoo Google Bing

https://al-arise-qa-main.citigovcloud.com/ line 1

Search engines may penalize invisible text where text is too small to be seen.

Google Yahoo Bing

`font-size: 0pt` `font-size: 0pt` `font-size: 0pt` `font-size: 0pt` `font-size: 0pt` https://al-arise-qa-main.citigovcloud.com/ line 1399 1402 1661 1689 1694 ...

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Arise Care Accessibility Report June 8, 2024

Standards

This section shows pages that do not comply with W3C standards.

Priority 1

6 issues on 1 pages

Attribute `:href` not allowed on element.

HTML5

https://al-arise-qa-main.citigovcloud.com/ line 63 89 112 138 167 ...

Attribute `:name` not allowed on element.

HTML5

https://al-arise-qa-main.citigovcloud.com/ line 1093 1127 2061 2084 2104 ...

Bad value for attribute `id` .

HTML5

An ID must not be the empty string. `id=''` `id=''` `id=''` `id=''` `id=''` https://al-arise-qa-main.citigovcloud.com/ line 63 89 112 138 167 ...

Bad value for attribute `type` .

HTML5

Bad value. `type='type'` https://al-arise-qa-main.citigovcloud.com/ line 1114

Duplicate `id` - the same ID is used on more than one element.

HTML5 WCAG 2.1 A 4.1.1 Section 508 (2017) A 4.1.1

`id=CreateConsumerForInquiryID` `id=CreateConsumerForInquiryID` https://al-arise-qa-main.citigovcloud.com/ line 1658 1666

The `a` element must not appear as a descendant of an element with `role=button`

HTML5 WCAG 2.1 A 4.1.1 Section 508 (2017) A 4.1.1

https://al-arise-qa-main.citigovcloud.com/ line 59 93 122 156 195 ...

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Usability

This section shows general usability issues, indicating navigation problems for all users.

Priority 2

2 issues on 1 pages

Omitting `img width` or `height` attributes makes the page layout jump about as images load.

This makes the page very hard to read or click while it's loading. Fix by adding width and height attributes to the `img` tag matching the image dimensions. In responsive layouts, specifying `width` and `height` prevents layout jumping because the browser can pre-calculate the final image size when CSS like this is used: `img { max-width: 100%; height: auto }`

Usability.gov 14:3 W3C

https://al-arise-qa-main.citigovcloud.com/ line 1006 1791

The `img width` and `height` attributes don't match the actual image size. This means the image will be distorted or resize during loading.

W3C

Image https://publicdev.fairfaxcounty.gov/apps/hhsims/images/Fairfax/seal.png actual dimensions: 270 x 270 pixels. https://al-arise-qa-main.citigovcloud.com/ line 3169

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Figure 9: ANDI Accessibility Test Report Compiled & Categorized Manually

9.3 Accessibility Issue Resolution

The results outlined in the above document provide actionable insights to support remediation and ongoing accessibility improvements. Each Issue is then resolved by the developers in consultation with the testing and compliance teams. The Techniques for WCAG 2.0 document and ANDI's Help Section provides all the guidance needed to resolve the issues. After the issues have been resolved, it is necessary to re-scan all the screens until we can validate that Arise Care has passed ANDI's compliance checks across the entire application.

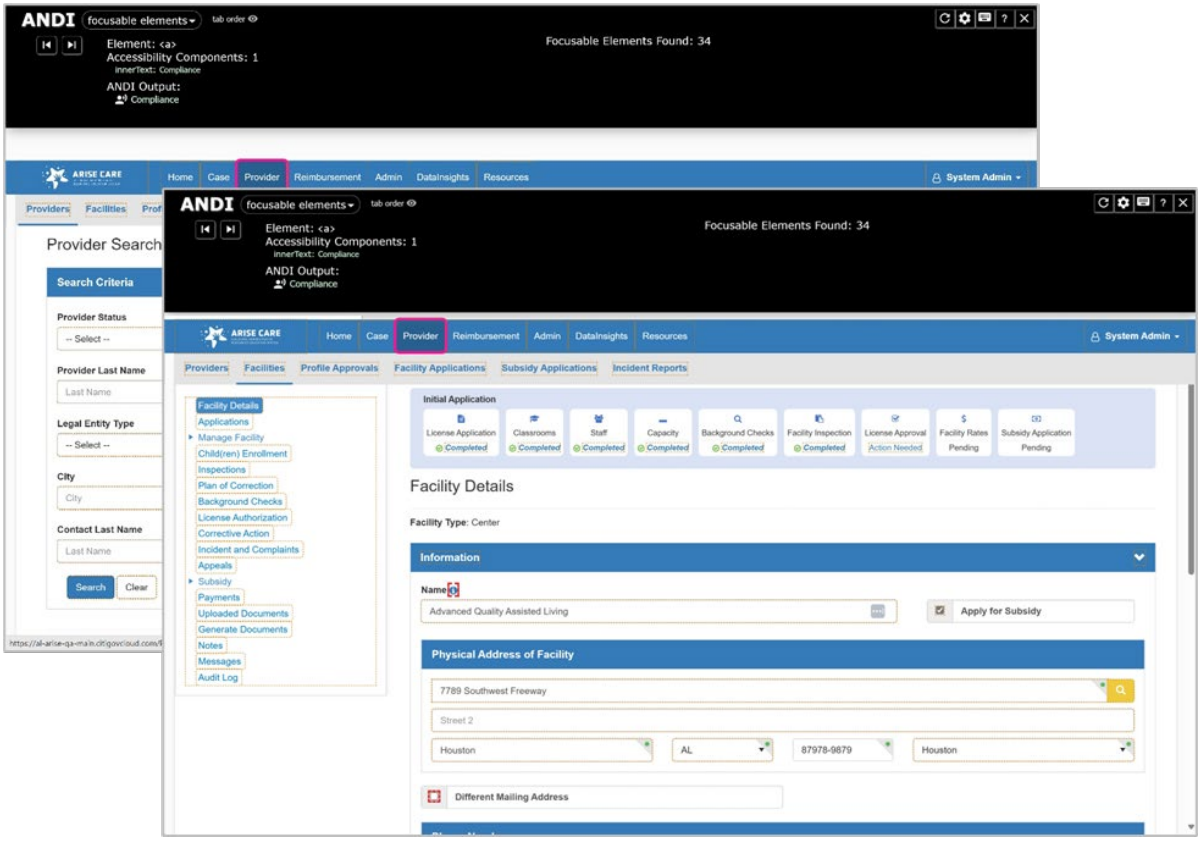


Figure 10: ANDI Accessibility Checker Displaying Complete Accessibility Compliance

10. AUTOMATED TESTING USING QUALIBOOTH ACCESSIBILITY TOOLKIT

For documentation purposes, we have used the example of automated accessibility testing of Arise Care Childcare Management Portal.

10.1 Overview of QualiBooth

QualiBooth is a tool that automatically scans and analyzes every page element of the website or web application and measures the level of accessibility and provides comprehensive insights in its report to enable developers to fix accessibility compliance issues. Testers can simply input the desired URL into the Qualibooth interface, and in a few moments, it provides a link to download the accessibility report.

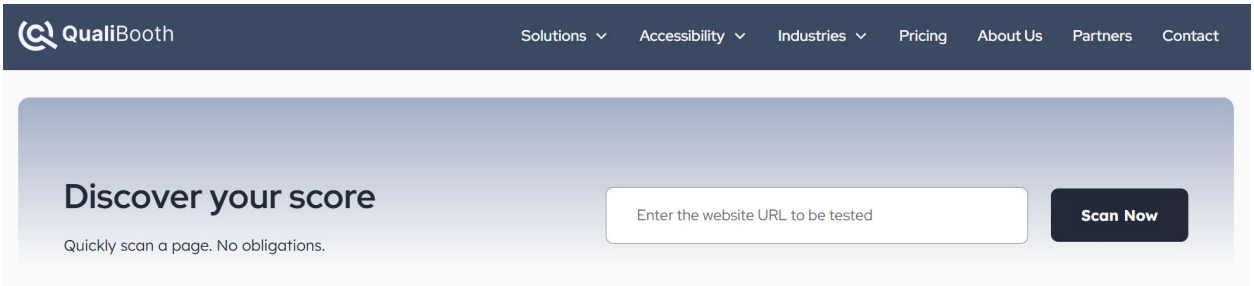
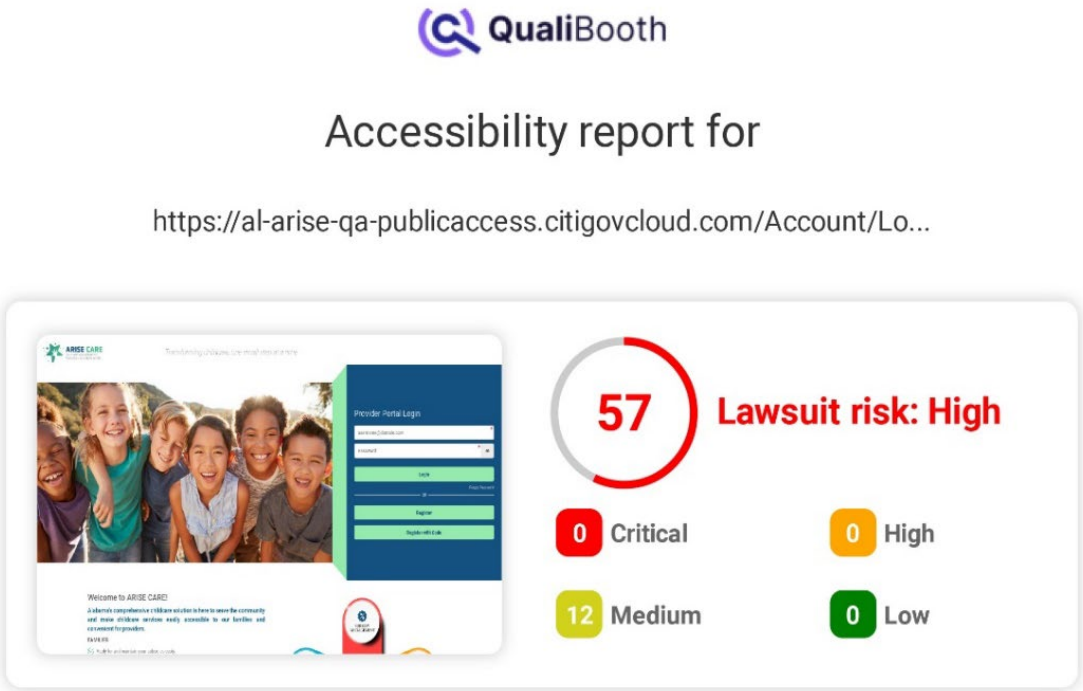
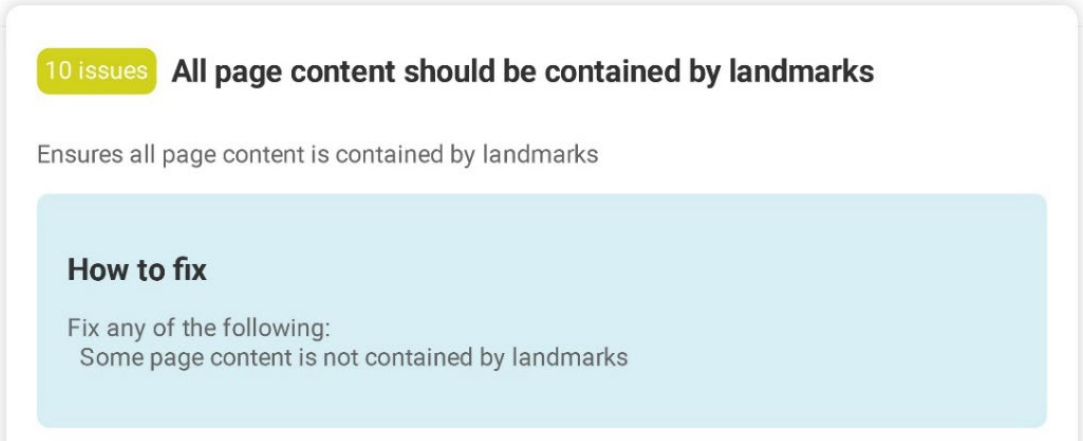


Figure 11: QualiBooth Accessibility Toolkit Interface

10.2 Accessibility Issues Report

We analyzed the Arise Care Childcare Management Portal web application using QualiBooth during production on 07 May 2024. Please note that the application was in the initial testing phase, so the compliance scores were expectedly quite low. The report that was generated is displayed below:





Elements - 10

```
<div class="header-container">
```

```
<div class="item active"> <img src="/images/login/adobestock_342302621.webp" alt="h
appy children"> </div>
```

```
<h3 id="form-title" class="">Provider Portal Login</h3>
```

```
<input class="form-control" data-val="true" data-val-required="The User name field is req
uired." id="UserName" name="UserName" placeholder="username@domain.com" type="t
ext" value="" aria-required="true" aria-invalid="true">
```

```
<input class="form-control pwd" id="Password" name="Password" placeholder="Passwo
rd" type="password" aria-required="true" data-val-required="The Password field is require
d.">
```

```
<a href="#" id="forgot-password-link" class="login-field" onclick="ToggleForgotPassword
(true, false)">Forgot Password</a>
```

```
<div class="separator login-field">OR</div>
```

```
<div class="info-container">
```

```
<div class="container-fluid blue-footer">
```

```
<div class="footer-container provider">
```

1 issue **Document should have one main landmark**

Ensures the document has a main landmark

How to fix

Fix all of the following:
Document does not have a main landmark

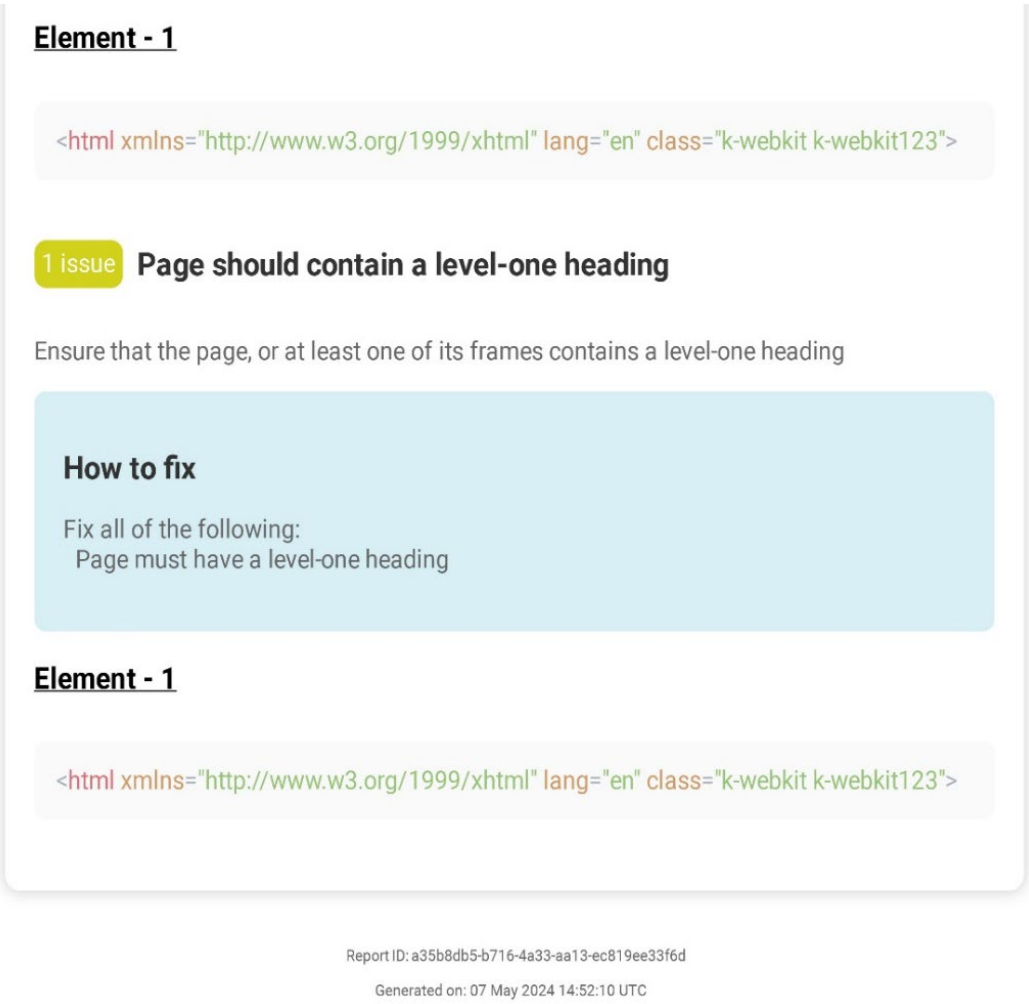


Figure 12: QualiBooth Report Displaying Non-Compliance on 07 May 2024

10.3 Accessibility Issue Resolution

Each issue was resolved by the developers in consultation with the testing and compliance teams. The Techniques for WCAG 2.0 document and the QualiBooth Report itself provided recommendations needed to resolve the accessibility issues. We re-scanned Arise Care Childcare Management Portal on 18 June 2024 after resolving most of the Issues and the latest report generated is given below.

Please note that efforts are ongoing to continuously monitor and enhance the accessibility scores for every application update, changes in accessibility guidelines, user feedback, and regulatory laws.

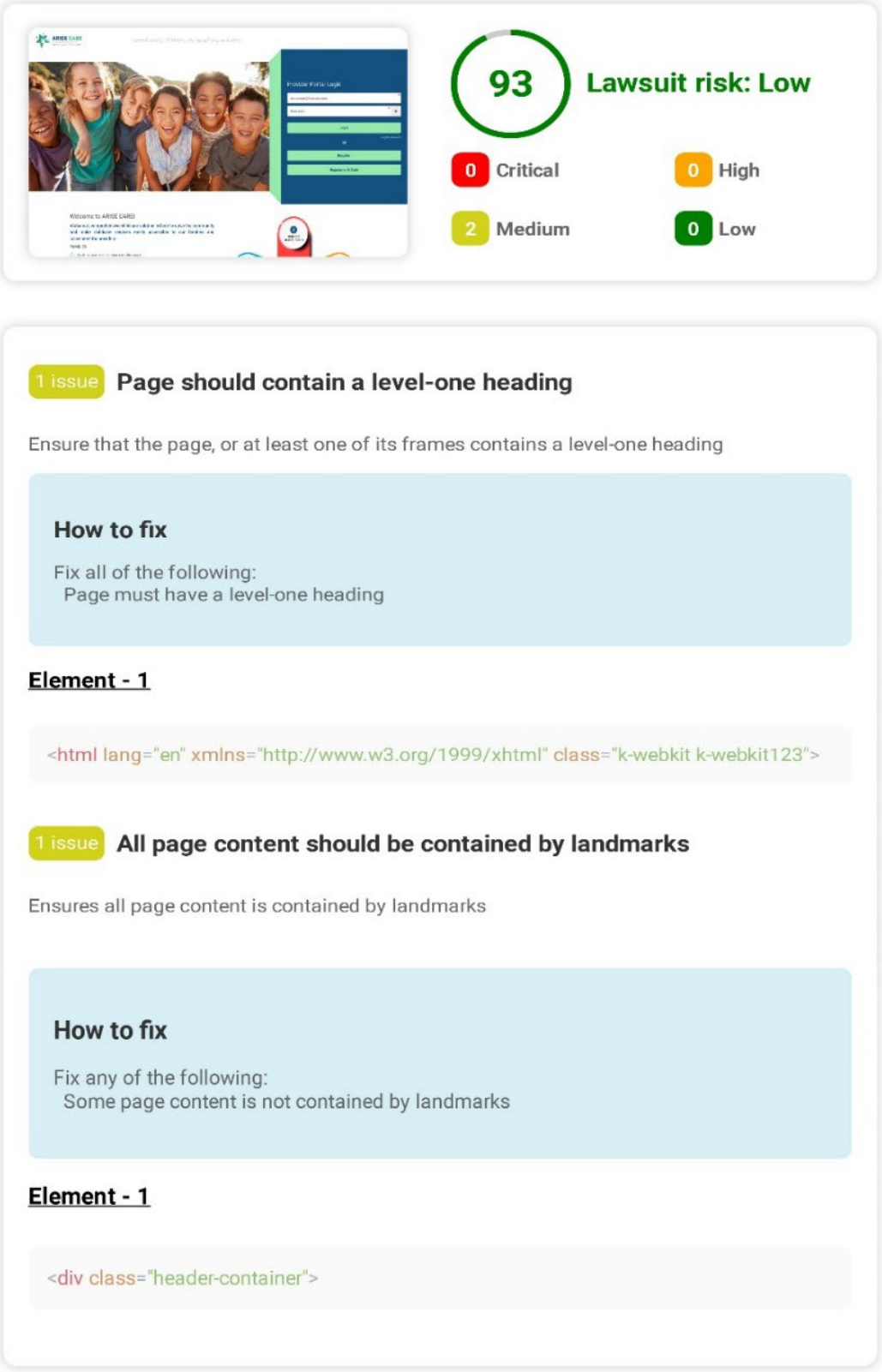


Figure 23: QualiBooth Report Displaying Compliance on 18 June 2024

11. ALTERNATE ACCESS METHODS

When a product/solution cannot fully meet accessibility technical standards, we provide **equally effective alternate access methods** to ensure individuals with disabilities can still access the same services and information. Although these methods are not fully compliant with accessibility technical standards, they serve as accommodations while the product is remediated or enhanced.

 **24/7 Toll-Free Support Line** Allow users to receive help from a support agent over the phone to complete tasks	 **Live Chat & Messaging Support** Allows users to receive information and/or help via chat/messaging features	 **Email-Based Support Services** Users can request services, information, or resolve issues via email-based service
 **Print/Digital User Manuals & Help Sections** Simplified or tagged versions of content such as user manuals or help sections	 **Video /Remote Desktop Support** Tech support walks the user through processes via video call or remote connections	 **Chat/IVR Bot Virtual Assistants** Seamless customer support experiences using AI-based Chat Bots and IVR Bots
 **Offline Data Synchronization** Allows users to complete tasks offline in areas of poor network connectivity and sync data later	 **In-Person Specialized Assistance** In-person tech support for users who face difficulties in completing critical and complex tasks	 **Assistive Device Loan Program/ Training** In special cases, provide users with accessibility tools or training on alternate access methods

CITI ensures that the following best practices are followed to ensure that the alternate features mentioned above are executed with perfection:

1. Clearly communicate alternate access methods on the main interface or help section.
2. Ensure customer service teams are trained in accessibility and disability etiquette.
3. Maintain logs of alternate method usage to inform future accessibility upgrades.
4. Include alternate access disclaimers during procurement and rollout of products/solutions.

12. ACCESSIBILITY CONFORMANCE DECLARATION

Various documents can be used to certify and declare that a product/application/website meets all accessibility requirements:

12.1 Voluntary Product Accessibility Template (VPAT®)

A VPAT is a standardized document that can be used to describe how our products or applications conform to accessibility standards such as Section 508 and WCAG. VPATs are a key tool in promoting inclusive technology procurement and development practices.

a. To download a **VPAT for Section 508 compliance**, click: VPAT2.5508_November2023.docx

b. To download a **VPAT for WCAG compliance**, click: VPAT2.5WCAG_November2023.docx

12.2 CITI's Accessibility Conformance Checklists

CITI has developed our very own Accessibility Conformance Checklists that can be used to declare that a product is compliant with Section 508 & WCAG.

a. To download the **Checklist for Section 508 Accessibility Conformance**, click: Section_508_Accessibility_Conformance_Checklist.xlsx

b. To download the **Checklist for WCAG 2.1 Accessibility Conformance**, click: WCAG_2.1_Accessibility_Conformance_Checklist.xlsx

13. POLICY REVIEW & UPDATES

This policy shall be reviewed and updated annually, or as legal/regulatory standards change. Any major updates will be approved by executive leadership and made available organization wide as well as in the public domain.

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