



STATE OF HAWAII  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

August 25, 2010

COMPTROLLER'S MEMORANDUM 2010-28

TO: Heads of Departments and Agencies  
SUBJECT: Policy Guidance on Web Site Accessibility

The State of Hawaii, Department of Accounting and General Services, Information and Communication Services Division (ICSD), has adopted the following policy relating to web site design and access to persons with disabilities.

POLICY

The Americans with Disabilities Act (ADA) of 1990 requires, in part, that state and local government entities ensure that all programs, services, or activities be accessible to persons with disabilities. Web sites are considered to be a program or service of government utilized to disseminate information to the public. Therefore, the State must ensure that these web sites are accessible to persons with disabilities.

Because the ADA does not contain any specific standards for web site accessibility, ICSD has established standards for the departments of the Executive Branch to meet the ADA requirements as set forth in the following technical guidelines.

Each agency's home page should include contact information to allow the public an alternative means to ask questions or request additional information. At a minimum, contact information should include a phone number, fax number and general e-mail address. E-mails received by a state agency should be responded to within two (2) business days.

TECHNICAL GUIDELINES


A previous document from March 2003 to Data Processing Coordinators established the following minimum Section 508 guidelines, which are intended to ease access to State web sites and make them accessible to persons with disabilities.

All web-based intranet and internet information and applications should be designed following standards set forth in Section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794d):

- (a) A text equivalent for every non-text element shall be provided.
- (b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.
- (c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.
- (d) Documents shall be organized so they are readable without requiring an associated style sheet.
- (e) Redundant text links shall be provided for each active region of a server-side image map.
- (f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.
- (g) Row and column headers shall be identified for data tables.
- (h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.
- (i) Frames shall be titled with text that facilitates frame identification and navigation.
- (j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.
- (k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.
- (l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by assistive technology.

- (m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).
- (n) When electronic forms are designed to be completed on-line, the form shall allow people using assistive technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.
- (o) A method shall be provided that permits users to skip repetitive navigation links.
- (p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.

Questions about this policy should be directed to the Administrator of Information and Communication Services Division, Department of Accounting and General Services at (808) 586-1910 or by email at [debra.a.gagne@hawaii.gov](mailto:debra.a.gagne@hawaii.gov).

  
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State Comptroller

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