

# TrueFiling Web Accessibility Roadmap

November 1, 2019

## Web Accessibility Conformance Timeline:

ImageSoft operates several websites that utilize the TrueFiling software. Throughout this document the use of the term “TrueFiling” is inclusive of all the websites operated by ImageSoft that run the TrueFiling software. ImageSoft constantly strives to provide full and equal enjoyment of the TrueFiling websites to all persons. ImageSoft plans to make significant accessibility improvements to TrueFiling in the following major phases:

- Phase I: June 30, 2020 - ImageSoft will ensure that TrueFiling websites conform to, at minimum, the Web Content Accessibility Guidelines 2.0 Level A Success Criteria (“WCAG 2.0 A”).
- Phase II: December 31, 2020 - ImageSoft will ensure that TrueFiling websites conform to, at minimum, Web Content Accessibility Guidelines 2.0 Level AA Success Criteria (“WCAG 2.0 AA”).

The major phases described above will be implemented using a multi-step approach, which is described in the remainder of this document.

## Web Accessibility Coordinator:

As of September 1, 2019, ImageSoft has designated an employee as a Web Accessibility Coordinator for TrueFiling who shall report directly to ImageSoft’s Chief Executive Officer. ImageSoft shall provide the name of and contact information for that person upon request. The Web Accessibility Coordinator:

- shall be knowledgeable about WCAG 2.0 and web accessibility generally;
- shall be responsible for overseeing, managing, and coordinating ImageSoft’s implementation of this Decree
- shall be responsible for reporting and documenting quarterly, at minimum, to ImageSoft’s Chief Executive Officer that all new releases have been made accessible pre-production; any post-production accessibility bugs have been remediated; and whether the requirements set forth in this Roadmap have been met, and, if not, what requirements have not been satisfied and why.

## Web Accessibility Roadmap

By November 15, 2019, in recognizing the importance of providing access to TrueFiling to all persons, ImageSoft shall develop and publish a roadmap document (this document) that will describe plans for making TrueFiling ADA compliant in a reasonable timeframe. This document will be accessible through a link on the TrueFiling websites.

## Web Accessibility Committee:

By December 31, 2019, ImageSoft shall appoint a cross-functional committee charged with monitoring and maintaining conformance of TrueFiling with WCAG 2.0 AA. The committee will assist and report to the Web Accessibility Coordinator.

## Customer Assistance for ImageSoft Users with Disabilities:

By December 31, 2019, ImageSoft shall train its Customer Service Personnel to escalate calls from users with disabilities who encounter difficulties using TrueFiling. ImageSoft shall have trained enough personnel to handle escalated calls and provide timely assistance to users with disabilities. ImageSoft shall establish procedures for promptly directing requests for assistance to such personnel including notifying the public that customer assistance is available to users with disabilities and describing the process to obtain that assistance.

## Web Accessibility Testing:

By December 31, 2019, ImageSoft shall train members of its Quality Assurance (QA) team to begin testing new releases of TrueFiling for accessibility conformance. QA will be instructed to report non-conformance as a bug in the software and document it for correction.

## Web Accessibility Feedback:

By January 31, 2019, ImageSoft shall provide a notice, prominently and directly linked from each of the TrueFiling homepages, soliciting feedback from visitors to a TrueFiling website on how the accessibility of the website can be improved; the link shall provide several methods to provide feedback, including an accessible form to submit feedback or an email address, and a toll-free phone number (with TTY) to contact representatives knowledgeable about the Web Accessibility Policy.

## Web Accessibility Policy:

By June 30, 2020, ImageSoft shall adopt and implement a Web Accessibility Policy consistent with the attachment at Exhibit A. By June 30, 2020, ImageSoft shall:

- distribute the Web Accessibility Policy to all Web Content Personnel, Client Care Advocates, and Customer Service Personnel for TrueFiling;
- provide a copy of the policy to each new Web Content Personnel, contractor responsible for web content, and Customer Service Personnel for TrueFiling;
- redistribute the corporate Web Accessibility Policy annually to all Web Content Personnel, contractors responsible for web content, and Customer Service Personnel;
- make publicly available and directly link from the TrueFiling website homepages, a statement of ImageSoft's policy to ensure that persons with disabilities have full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of ImageSoft, through TrueFiling; and
- accompany the public policy statement with an accessible means of submitting accessibility questions and problems.

## Web Accessibility Training:

By June 30, 2020, and at least once annually thereafter for the term of this Roadmap, ImageSoft shall provide mandatory web accessibility training to all employees who write or develop programs or code for, or who publish final content to TrueFiling on how to conform all web content and services with, at minimum, WCAG 2.0 AA and the terms of this Roadmap. Web Content Personnel also shall receive the training when they are hired into a position that includes such a role. ImageSoft shall ensure that

contractors are familiar with WCAG 2.0 and the requirements of this Roadmap to the extent necessary to perform the duties under their contract.

## Performance Reviews of Web Accessibility Coordinator and ImageSoft Employees:

By June 30, 2020, Performance reviews of the Web Accessibility Coordinator and all employees identified in this document shall include consideration of the degree and effectiveness with which each took accessibility considerations into account in the performance of their respective duties, once they have had the opportunity to receive accessibility training as required above.

## User Accessibility Testing Group:

By June 30, 2020, and at least once annually for the term of this Roadmap, and whenever a substantial proposed change to TrueFiling is made available to any group of ImageSoft users or customers (e.g., Beta testing), such changes shall be tested by individuals with different disabilities, including at a minimum individuals who are blind, deaf, and/or have physical disabilities affecting manual dexterity (such as those limiting the ability to use a mouse), to identify any accessibility barriers not otherwise apparent through automated testing.

## Modification of Bug Fix Priority Policies:

By June 30, 2020, ImageSoft shall modify existing bug fix policies, practices, and procedures to include the elimination of bugs that create non-conformance with WCAG 2.0 AA to TrueFiling (“Modified Bug Fix Priority Policies”). The Modified Bug Fix Priority Policies shall ensure that any bugs that create non-conformance with WCAG 2.0 AA to TrueFiling are remedied with the same level of priority (e.g., speed, resources used to remediate) as any other equivalent loss of function for individuals without disabilities.

## Web Accessibility Consultant and Evaluation:

By June 30, 2020, ImageSoft shall retain an independent consultant (“Web Accessibility Consultant”) who has expertise concerning accessible web development and WCAG 2.0.

- By June 30, 2020, and annually thereafter, the independent Web Accessibility Consultant shall provide the parties a written evaluation. This evaluation shall describe: whether TrueFiling is in conformance with requirements of WCAG 2.0 AA and this Roadmap: include any recurring, frequent, or significant deviations from the Modified Bug Fix Priority Policies, and shall make recommendations to improve the accessibility of TrueFiling and/or the mobile applications (“Web Accessibility Evaluation”).
- The Web Accessibility Consultant shall provide copies of the Web Accessibility Evaluation to all parties to this Decree.
- ImageSoft shall incorporate all of the recommendations contained in the Web Accessibility Evaluation within ninety (90) days of receiving the Accessibility Evaluation; provided, any recommendations for the Online Tax Preparation Product shall be made thirty (30) days prior to release.

## EXHIBIT A - Website Accessibility Policy

**General Policy:** It is ImageSoft's policy to ensure that persons with disabilities have a full and equal opportunity to benefit from the goods, services, privileges, advantages, and accommodations offered by ImageSoft through the TrueFiling websites, and on other websites under its control and to which it provides content for the public. ImageSoft provides effective communication with persons with disabilities and ensures that individuals with disabilities are not excluded from them by ImageSoft's policies, standards, criteria, or methods of administration.

**Web Accessibility:** ImageSoft provides online content in the following manner to ensure it is accessible to individuals with disabilities on TrueFiling and mobile applications:

- All new web pages, web applications, and content published to TrueFiling for public use shall conform to the Level A and Level AA Success Criteria and Conformance Requirements of the Web Content Accessibility Guidelines ("WCAG") 2.0 (Dec. 11, 2008), published by the World Wide Web Consortium ("W3C"), Web Accessibility Initiative ("WAI"), available at [www.w3.org/TR/WCAG/](http://www.w3.org/TR/WCAG/).
- ImageSoft provides a notice, prominently and directly linked from the TrueFiling homepage, soliciting feedback from visitors to TrueFiling on how accessibility can be improved and providing contact information for Call Center personnel knowledgeable concerning this policy.
- ImageSoft annually distributes this Policy to all personnel that design, develop, maintain, manage, or otherwise have responsibility for the content and format of TrueFiling ("Web Content Personnel").
- ImageSoft has designated a Web Accessibility Coordinator for TrueFiling, who is knowledgeable concerning the WCAG 2.0 and web accessibility generally and is available as a resource for Web Content Personnel.
- ImageSoft provides annual training on web accessibility to Web Content Personnel and considers the degree and effectiveness with which personnel took accessibility considerations into account in the performance of their duties when reviewing their performance.
- ImageSoft annually assesses and reviews the delivery of content via TrueFiling to ensure inclusion, integration, and equal treatment of, as well as effective communication with, persons with disabilities, including, among others, persons that:
  - Use screen readers or voice interactive software;
  - Only or predominantly use keyboards to input data and to navigate websites;
  - Use Braille output devices;
  - Use on-screen keyboards;
  - Use text magnification software;
  - Require the ability to adjust font size and/or color to view web pages;
  - Require audio description to access video content; and
  - Require captions to access audio and visual materials.
- ImageSoft regularly conducts automated tests and annually enlists individuals with a variety of disabilities to test TrueFiling for accessibility.
- ImageSoft will retain a Web Accessibility Consultant to annually evaluate TrueFiling for conformance with WCAG 2.0 to the Level A and Level AA Success Criteria and other

Conformance Requirements, the requirements of this Policy. Each year, the Web Accessibility Consultant prepares a written report based on the evaluation, which identifies any barriers and provides recommendations to enhance the accessibility of TrueFiling.

**Compliance with the Policy:** ImageSoft requires employees and contractors to comply with this policy. Failure to comply with this policy may result in disciplinary action.

## Exhibit B – Roadmap Overview

### ADA Roadmap Overview

<i>Task</i>	<i>Due Date</i>	<i>Responsible</i>	<i>Notes</i>
WCAG Accessibility Coordinator	9/1/2019	Scott	Done
Create roadmap and publish with link on TrueFiling websites	11/15/2019	Scott	Done
Web Accessibility Committee	12/31/2019	Scott	Done: Committee: Scott, AJ, Kimbley, Amy
Customer Assistance for ImageSoft Users with Disabilities	12/31/2019	Scott, Tom	Met with CC leadership and discussed process and escalation. They agreed to make ADA awareness and escalation part of their onboarding training.
Quality Assurance / Testing changes	12/31/2019	Scott, AJ	10/2019: Michelle M installed screen reader technology and began testing for ADA compliance on new releases and software changes.
Web Accessibility Feedback	1/30/2020	Scott	2/2020: published feedback form on truefiling.info and have a link added to all TrueFiling sites. New form: <a href="http://www.truefiling.info/accessibility-inquiry/">http://www.truefiling.info/accessibility-inquiry/</a>
<b>Phase 1: WCAG 2.0 A Compliance</b>	6/30/2020		
Web Accessibility Policy	6/30/2020		
Web Accessibility Training	6/30/2020		
Performance Reviews of Web Accessibility Coordinator and ImageSoft Employees	6/30/2020		
User Accessibility Testing Group	6/30/2020		
Modification of Bug Fix Priority Policies	6/30/2020		
Web Accessibility Consultant and Evaluation	6/30/2020		
<b>Phase 2: WCAG 2.0 AA Compliance</b>	12/31/2020		