

Accessibility Plan for ModCloth

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Prepared on: December 9, 2020

Prepared for: ModCloth.com

Introduction

The purpose of this document is to provide ModCloth with a detailed plan of how to incorporate and manage accessibility efforts in the organization that meets the international standards of the Web Content Accessibility Guidelines (WCAG). This plan will also help ModCloth create content that is suitable to be consumed using assistive technology (AT) such as screen readers.

Why Focus on Accessibility

Accessibility is the practice of making a website usable by as many people as possible regardless of disability type or severity of impairment. Accessibility is a quality – in this case, it means how easily and effectively a product can be accessed and used. Making things accessible promotes usability, and conforming to WCAG guidelines isn't just good for people with disabilities, it's useful for everyone.

Websites should be inclusive for everyone to easily use and when they aren't accessible, they create barriers for people with disabilities. Websites should provide equal access and equal opportunity to people with diverse disabilities. Case studies show that accessible websites have better search results, reduced maintenance costs, and increased audience reach, among other benefits. Accessibility benefits people with and without disabilities and the risk of not creating an accessible website limits customer usage, overall growth and will negatively impact sales for ModCloth.

Current State of Accessibility

ModCloth currently has minimal accessibility requirements in their design and development processes. Accessibility is only considered as a last step in the process when it should be an integral part of the initial planning process. ModCloth.com has many barriers for people with disabilities and failed the majority of the WCAG checkpoints through the automated and manual code inspection as well as the experience walkthrough. It is clear that the lack of importance of including accessibility standards has rendered the current site unusable by people with disabilities and ultimately negatively impacts the brand and overall revenue growth of the company.

Accessibility Management Plan

The most effective way to ensure accessibility is to incorporate it into the culture and actively monitor and manage it. This section will address a four phased approach on how to implement and manage accessibility throughout the organization.

Initiation Phase

The initiation phase will help ModCloth develop a baseline understanding of accessibility and its importance while raising awareness and gathering support throughout the organization.

Implement a Business Case

Accessibility needs to be included in the core mission and a strong business case can help gain buy-in from stakeholders and can make accessibility an organizational priority. There is a mix of motivating factors that need to be considered when implementing an integrated accessibility program as defined below:

Drive Innovation - Accessibility features in products and services often solve unanticipated problems. Accessibility is closely related to general usability – both aim to define and deliver a more intuitive user experience.

Extend Market Reach - The global market of people with disabilities is over 1 billion people with a spending power of more than \$6 trillion. Accessibility often improves the online experience for all users. Designing for extreme use cases presented by people with disabilities means that building digital solutions are much more usable for everyone.

Enhance Brand Recognition - ModCloth needs to not only protect, but also enhance their brand in order to stay relevant and maintain brand loyalty. It is important to provide solutions for the diverse needs of stakeholders and make the commitment to sustainable, inclusive marketing and employment practices, which can achieve a range of benefits. Employing people with disabilities is an essential aspect of creating a diverse workforce. To be successful, the technology that employees use, including websites and applications, must be accessible.

Minimize Legal Risk - Investing in accessibility at the beginning of every effort will help mitigate legal risks and help avoid litigation. The risk of ignoring accessibility requirements can result in legal consequences and large financial fines. With legal risks increasing, there is an increasing need to create accessibility policies and programs to protect business's assets and reputations.

Raise Awareness

Since ModCloth does not have strong accessibility requirements it is assumed that many employees may know little or nothing about accessibility. It is critical to educate employees on accessibility and raise awareness of the value-adds and importance throughout the organization. Accessibility awareness can permeate a company culture and help it be perceived as open and fair. People should be proud to work and do business with ModCloth.

Suggested activities to help raise awareness:

- Setup accessibility events with subject matter experts
- Build an internal communication plan with Marketing and Human Resources
- Visit an accessibility lab that helps mimics people with disabilities to build empathy
- Organize team outings to local community center for people with disabilities
- Bring in people with disabilities for panel discussions about their experiences to help raise awareness of the unique needs and traits of their daily life

Gather Support

Organization-wide support is vital to ensure accessibility is distributed across the organization and sustained. ModCloth management and key stakeholders need to demonstrate how a strong commitment to accessibility results in distributed responsibility and shared understanding. Stakeholder buy-in and management support will help influence this support.

Suggested activities to gather support:

- Have the CEO and other executives speak about it at various all-employee meetings
- Require a mandatory accessibility training for all employees
- Include accessibility demonstrations and training when on-boarding new employees
- Create an internal accessibility group that helps create monthly events, newsletters and updates employees on a quarterly basis

Success Criteria of Implementation Phase:

- Business plan is shared on the company intranet
- CEO promotes the importance of accessibility at an all-employee meeting
- Key stakeholders have taken a mandatory base level training on accessibility

Planning Phase

The planning phase will help develop clear goals and an environment that supports accessibility.

Objectives

Clear objectives identify key deliverables and define how to measure success. Objectives help provide focus and clarity to what activities need to be planned and defined in order to ensure that successful delivery can be determined. The following objectives have been defined:

- Review and publish an accessibility policy
- Determine governance of accessibility by assigning responsibilities to specific roles
- Evaluate current website and address issues that do not conform to Level A/AA criteria
- Prepare and conduct ongoing dedicated training programs for all employees
- Modify design and developer approval process to include accessibility considerations

Budget and Resources

The following budget and resources need to be clarified and secured for successful accessibility implementation. This includes necessary reviews, training, audits, and testing with users. It is recommended that the following be considered:

Activity / Resource	Frequency	Cost
External Audit of Current Site	Once	\$1,000.00
Internal Accessibility Evaluation	Quarterly	<i>Internal</i>
Test New Releases with Target Users (<i>7 per session</i>)	Bi-Annually	\$1,400.00
Mandatory Organizational Training	Once	<i>Internal</i>
On-going Annual Staff Training	Quarterly	\$1,500.00
Adobe Content Management System (CMS)	Annually	\$6,000.00
Review Accessibility Policies, Procedures & Trainings	Annually	<i>Internal</i>

TOTAL \$10,000.00

Assignment of Responsibilities

It is important to understand what roles are needed to ensure all tasks are covered by the correct individuals and the responsibilities are incorporated into their job description. Clear identification also helps communicate who is responsible for accessibility and that it is being prioritized.

Role	Responsibility
Marketing	Embed accessibility within brand guidelines and publish internally for ease of use
Quality Assurance	Continually test for and track accessibility issues within the code and provide quarterly reports on findings
Design	Provide accessible design solutions that meet target user's needs based on research and testing validation
Development	Maintain code libraries with accessible components and preserve close partnership with design to ensure quality
Web Content Managers	Ensure all staff receives appropriate and ongoing training

Accessibility Policy

Good accessibility policies are informed by knowledge and align to the needs of the target audience. The policy will ensure everyone in the organization understands the importance of accessibility and helps standardize the way your ModCloth approaches accessibility. Below is the defined accessibility policy:

ModCloth is dedicated to serving all individuals including those with disabilities. To provide full and equal enjoyment of our products and services by everyone, we comply with the Web Content Accessibility Guidelines (WCAG) 2.0.

ModCloth's minimum conformance level is AA. Meeting A and AA conformance levels create good experiences for assistive technology and meets the design and experience requirements. It also supports ModCloth's brand reputation and legal responsibilities.

Existing web content produced by the organization will meet the standard by May 1, 2021.

Content provided for the site by third-party developers will meet WCAG 2.0 level A and AA by October 1, 2021. This does not include user-generated content.

This policy will be reviewed annually starting December 1, 2021. This policy was last reviewed on December 1, 2020.

Monitoring Framework

It is important to implement a standard way of monitoring and reporting findings in order to track progress over time. The milestones below will help ModCloth track progress and ensure they are successful:

Objective	Success Criteria	Deadline
Create accessibility policy	Reviewed and published to internal website	January 2021
Determine governance of accessibility	Assignment and share out of responsibilities to specific roles	March 2021
Evaluate Current Website	Automated and manual code inspection completed with report of findings	May 2021
Ensure Current Website is Accessible	Address all issues and ensure they conform to Level A and AA WCAG success criteria	December 2021
Provide Dedicated Training	All employees have taken and acknowledged accessibility training	June 2021
Modify Design/Developer Process	Add accessibility checklist to designer and developer process and conduct accessibility review before content is released	Ongoing
Engage Stakeholders	Meet with stakeholders and inform them of updates, concerns and next steps for inclusion	Quarterly

Success Criteria of Planning Phase:

- Proposed budget and resources are approved by key stakeholders
- Accessibility policy is published on internal intranet
- Roles and responsibilities of governance team are implemented
- Full audit and proposed recommendations to conform to WCAG 2.0 is completed

Implementation Phase

The implementation phase is to help ensure employees are trained, tools are available, and accessibility is included throughout the organization.

Training Employees

Training is an initial investment that pays off as the understanding of accessibility increases and becomes more common practice. Increase of knowledge should result in more accessible implementations up front, helping to reduce evaluation and rework costs and limit risk. The following program is suggested to provide employees with the right skills and expertise to implement accessibility:

Employee Group	Proposed Content of Training
Everyone	Introduction to Accessibility Course
Stakeholders	Benefits of accessibility for a business (Business Case and ROI) and methods on influencing employees with a top-down approach
Designers	Accessibility design checklist and basic non-negotiable standards of inclusive design to adhere by
Compliance	Accessibility regulations with an accessibility policy, standards, and guidelines, and a defined scope of applicability
Marketing	Brand guidelines for implementation and maintenance of accessibility
Developers	Considerations of accessibility that need to be included in code markup and proper methods of testing and evaluating content prior to release
Web Content Managers	Ongoing and industry level training to ensure they can create, manage and implement training across the organization

Integrate Accessibility Within Existing Policies

Integrating accessibility within other organizational procedures and policies will help spread the responsibility but also ensure that accessibility is considered as an integral part of day-to-day activities. Below are recommended ways to integrate accessibility within ModCloth:

Staff Training – Provide accessibility training as part of staff and career development plans, to support the development of staff expertise.

Content Review Process – Incorporate accessibility reviews as part of the web content publishing workflow, to ensure that good practice is maintained and that final web content continues to be accessible.

Recruitment policies – Include relevant accessibility skills in general recruitment briefs and policies, to support the recruitment of staff expertise.

Procurement process – Ensure that suppliers are aware of the accessibility requirements by including criteria in any request for quotations and contracts.

Evaluate Early and Often

Evaluating accessibility early and often allows ModCloth to fix issues early in the process to reduce risk and cost. It is recommended that designers adhere to marketing brand guidelines and the designer's accessibility checklist prior to starting any effort to help mitigate any risk and accessibility issues up front. All web pages, back-end processes and/or stand-alone components created by the development team need to be tested and evaluated prior to release to ensure they conform to all Level A and Level AA WCAG 2.0 standards.

Include testing with target users with disabilities quarterly per the budget and resource timeline and encourage employees to attend testing sessions as this will provide insight and context into barriers experienced by users and help build empathy.

Prioritize Issues

Prioritizing how to fix current issues is imperative in order to move fast and provide high value impact. It is recommended that the key employee groups of design, compliance and developers receive full training on accessibility as well as update their processes and workflows to immediately incorporate and consider solutions that adhere to the WCAG 2.0 guidelines. The next in priority will be to fix all Level A failures addressed in the evaluation of the current website and then focus on the Level AA failures.

Success Criteria of Implementation Phase:

- Train all employees on basic introduction of accessibility
- Dedicated training programs for key employee groups created (Design, Development and Compliance)
- Accessibility procedures implemented into design and development processes
- All work is reviewed for accessibility prior to release
- All issues from the accessibility audit report is fixed and the current site passes all WCAG 2.0 guidelines

Maintenance Phase

The maintenance phase will help ensure that accessibility remains a top priority and key issues are identified and addressed over time.

Monitor and Review

It is important to continue to review new content and look for opportunities of improvement. Daily content publishing and maintenance activities need to be reviewed as well as broader redesign and development efforts. It is recommended that regular accessibility reviews are performed on all new efforts and before any release to production in order to reduce risk of issues.

The CMS tool will be reviewed on an annual basis to ensure it is compliant and competitive against industry solutions and still meets the needs of the ModCloth organization. Ongoing training and on-boarding of new employees is also important to ensure no employee falls behind on knowledge, skills or expertise for their specific role. Ensure that resources providing guidance on digital activity include advice on accessibility.

Evaluate and Adjust

Ongoing evaluation with target users with disabilities is key to long term success. Monitor evaluations and use a standardized template for reporting in order to track trends and improvements on an annual basis. Incorporate user feedback into product development on key web pages and stand-alone components.

Review tools for accessibility testing in the development process to ensure there are no manual processes. Automate as much work as possible to be efficient and reduce human error to allow for a quicker release to market. Continue to review and identify opportunities to integrate accessibility knowledge into professional development.

Ongoing Communication

Work continually with stakeholders in order to prioritize accessibility. Continued engagement will ensure that all business partners are aware of improvements and major issues are addressed each quarter. Consider revising the communication plan if the organization is restructured or adds new products and services.

Track Standards and Legislation

Standards and legislation can change often and it is critical to keep up-to-date to ensure the company is adhering to the most current standard. As per the accessibility policy, standards and legislation will be reviewed on an annual basis at the same time as the accessibility policy itself. Ensure that any changes that have been made are embedded into all existing policies and procedures and key employees are trained accordingly to ensure it is implemented correctly. Share information about accessibility updates in a way that is targeted and effective to the appropriate audiences.

Adapt to New Technologies

Track, adopt and adapt to new accessibility-related technologies as they emerge. Consider what technologies the current site supports and track any functionality that changes with new versions or updated releases so that ModCloth is always in conformance with WCAG 2.0 guidelines. Maintain an updated list of supported browsers the current website uses and ensure that all new versions are compatible or a plan is in place on how to adapt to the new release.

Success Criteria of Maintenance Phase:

- Daily content publishing is reviewed for accessibility conformance
- Ongoing accessibility reviews for all new work prior to production release
- Annual review of accessibility policy and organizational procedures
- Archive and retention of accessibility review documentation for minimum of 1 year
- Annual review and audit of existing CMS tool to ensure it is still compliant