

# The Kansas Partnership for Accessible Technology

2012 Annual Report



April 26, 2013

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# 2012 ANNUAL REPORT

*The Kansas Partnership for Accessible Technology*

## PREFACE

This report, the fifth since 2008, provides an overview of the efforts undertaken by the Kansas Partnership for Accessible Technology (KPAT) to make the use of technology by government and its partners accessible to employees, business, and citizens. As last year was the first that the state has had the means to conduct an automated assessment of the status of the accessibility of State of Kansas websites, this represents the first opportunity for a year-to-year comparison of such data. A copy of the annual reports issued by the KPAT, including this one, can be found online at: <http://oits.ks.gov/kpat/reports/>.

## ABOUT THE KANSAS PARTNERSHIP FOR ACCESSIBLE TECHNOLOGY

### Purpose

The Kansas Partnership for Accessible Technology was established by Executive Order 08-12 in December 2008 as an independent committee composed of senior program and policy leaders representing key stakeholders in accessible technology charged with coordination and oversight of a program to carry out the state's commitment to information technology (IT) accessibility. The Partnership is charged with the following responsibilities:

- Address web and IT accessibility issues
- Provide related policy, standards, guidelines, and procedural recommendations,
- Coordinate, review, and provide recommendations on programs for enterprise wide assessment and monitoring of accessibility compliance,
- Review the State of Kansas Web Accessibility Requirements (Information Technology Policy 1210) and related documents annually and update as required,
- Develop and provide information, training, support, and resources on web and information technology accessibility,
- Work jointly to accomplish its mission with officials from other state agencies, organizations and county, municipal and tribal governments, as well as with businesses and organizations in the private sector whose products, services, or activities affect the accessibility of state services, programs, or systems.
- Establish a leadership role for Kansas in the national effort to improve access to and use of information and services by individuals with disabilities.

## Membership

Membership is drawn from a wide variety of state agencies, as well as from disability community advocacy organizations and local government. Appointments to the Partnership are as specified in Executive Order 08-12. A list of current members is provided in an appendix to this report.

## Program

The Partnership operates within the state IT governance structure and functions as a standing advisory committee to the Information Technology Executive Council (ITEC) and other committees, boards and commissions as appropriate. It meets quarterly and commissions ad hoc working groups to carry out individual initiatives. For administrative purposes, the Partnership is housed in the Office of Information Technology Services and it receives staff support from the Director of IT Accessibility.

A copy of Executive Order 08-12 is provided in an appendix to this document.

## 2012 GOALS AND ACCOMPLISHMENTS

### Goals

The overarching goal of the state IT accessibility program is to provide the leadership, policy direction, and support necessary to make all State of Kansas content and services delivered through information and communications technologies accessible. We believe successful implementation involves several dimensions:

- **Governance:** Involving affected stakeholders to develop and implement policy and standards; providing leadership in working with other governance bodies to proactively address IT accessibility
- **Assistance:** Providing consulting, training, documentation, and support for technology implementers, both technical (e.g., for web developers) and relating to process (e.g., procurement standards); facilitate understanding legal liability and responsibilities
- **Communication:** Advocacy for affected constituent groups; raising and maintaining awareness of the issues, requirements, and solutions; promoting the initiative; listening to concerns; and championing successes
- **Assessment:** Collaborate with and assist organizations in monitoring compliance, establishing accountability, reporting progress to stakeholders and oversight groups.

### Accomplishments

#### Governance

The Partnership actively worked to fulfill its responsibilities in the area of governance in 2012. Highlights include:

- Reviewed and approved the Web Accessibility Compliance Statements of 10 state IT projects with budgets in excess of \$250,000, under the accessibility stipulations introduced in the December 29, 2010 revision of the Information Technology Project Planning Guidelines (ITEC Policy Guideline 2400A). Of these projects, there were seven from six agencies, representing approximately \$21,714,000, to which the State of Kansas Web Accessibility Requirements (ITEC Policy 1210) were applicable (based on the inclusion of web-based user interface components), and for which these requirements were explicitly included, along with accessibility testing, in the project plans. An additional seven projects from six agencies, representing approximately \$15,024,000, are currently in the high-level planning stage, with confirmation that they will likewise include the accessibility requirements. In several of these cases, substantive discussions with agency and/or vendor personnel relating to these requirements have occurred as a direct result of this process, cementing compliance early and avoiding costly post-development remediation or non-compliant implementation.
- Developed formal comments (see <http://go.usa.gov/PIW>) on the federal Information and Communication Technology (ICT) Standards and Guidelines second draft published in December 2011 and worked with State ADA Coordinator Anthony Fadale to deliver them to the federal Architectural and Transportation Barriers Compliance Board (Access Board). The draft proposes to update the standards for electronic and information technology in the federal sector covered by Section 508 of the Rehabilitation Act (adopted by the state) and the guidelines for telecommunications products subject to Section 255 of the Telecommunications Act.
- Participated in the National Association of State Chief Information Officers (NASCIO) Section 508 Working Group to also provide input on its comments (see <http://go.usa.gov/mOz>) on the ICT Standards and Guidelines draft.
- Continued to work with the Kansas Department of Health and Environment's and the Kansas Department for Children and Families' Kansas Eligibility Enforcement System (KEES) project staff to ensure that project's compliance with accessibility requirements.

## Assistance

The primary staff person supporting the Partnership is the Director of IT Accessibility, Cole Robison. Either directly, or with his guidance, various types of accessibility-related assistance were provided to state agencies and other organizations throughout 2012. Examples include performing accessibility assessments of state websites at the request of site owners, assessing IT Project deliverables, evaluating and remediating Portable Document Format (PDF) documents, performing functional testing on documents using assistive technology, and answering inquiries for state agencies regarding a variety of topics, including basic accessibility; accessibility of particular web technologies such as forms, maps, JavaScript, and ASP.NET; PDF and Office document format accessibility; and requirements interpretation.

With the implementation of the Accessibility Management Platform (AMP) (see *Assessment*, below), Mr. Robison also assumed the role of administrator for that system, providing account management and technical support for over 200 users. Four training sessions were held on AMP

general usage, presented jointly via webinar by Mr. Robison and a trainer from SSB BART Group (developer of AMP), reaching an estimated 114 people.

## Communication

The Partnership continues to serve as a vehicle for communicating on accessibility-related topics with its members and the communities they represent. Specific examples of outreach include presenting on Partnership activities relating to assessment and the AMP rollout to the Information Technology Advisory Board, at a meeting of Cabinet agency Public Information Officers, and to Regents institution Chief Information Officers gathered at the Conference on Higher Education Computing in Kansas in Manhattan.

We continued to develop and support the KPAT website (<http://oits.ks.gov/kpat/>), an integral part of our efforts to deliver information about accessible technology to stakeholder organizations. In 2012 we added a new section dedicated to the AMP program.

## Assessment

One of the keys to being effective in addressing the subject of information technology accessibility is the ability to assess compliance with state standards. From this capability comes the ability to establish an initial benchmark for compliance, to design training and communication that specifically targets identified deficiencies, to provide feedback to agencies about potential issues in need of remediation, and a method to identify best practices that can be shared across the enterprise.

In 2012 we completed our rollout of the Accessibility Management Platform (AMP), an enterprise tool for use in performing automated assessment of the state's compliance with ITEC web accessibility requirements. This included direct engagement of agency personnel to provide them with the information they need to understand and most fully utilize AMP, as well as the aforementioned training. An overview of some of the high-level, statewide results from evaluation with AMP is provided in the following section.

With the grant-funded one year licensing term for AMP expiring last November, determining means to renew the license was a high priority in 2012. We are most grateful that the Office of Information Technology Services (OITS) answered the call and funded the license renewal.

AMP provides for automated and manual evaluation of traditional, HyperText Markup Language (HTML)-based web content, which has generally been the focus of most web accessibility attention to date. As configured for the State of Kansas, though, AMP also provides document inventory capabilities, and these were used to determine the extent of non-HTML website content, particularly in the form of PDF files. This scope assessment demonstrated that these make up an even larger share of State web content than previously thought—comparable, in fact, to the HTML-based portion. This study, along with additional research performed, has laid the groundwork for the pursuit of a PDF accessibility initiative similar to what we've instituted for HTML.

In addition, the KPAT worked with the Kansas Information Technology Office to include web accessibility assessment status in the template used by agencies to complete their Three Year

Information Technology Management and Budget Plans. In this, the second year that the question has appeared in the survey (and the first since AMP has been widely available), 32 agencies indicated they have completed an accessibility assessment of their external web site(s), with 13 indicating they have not, and one indicating such an assessment was in progress. (For more detail, please see *Three Year IT Management and Budget Plans* below.)

## ACCESSIBILITY STATUS OF STATE OF KANSAS WEBSITES

### AMP Assessment

As we did a year ago, we have used AMP to perform an automated evaluation of a sampling of sixty-three major agency websites. The entities included were those listed on the Agency Contact Listing page of the Communication Directory at <http://da.ks.gov/phonebook/>, as well as the Legislature and additional public universities listed at [http://www.kansasregents.org/interactive\\_map\\_listing](http://www.kansasregents.org/interactive_map_listing). Each of these sites was automatically spidered by AMP to a maximum depth of 250 pages from its home page to comprise the assessment sample. These data were collected in January 2013.

This resulted in 11,031 pages being evaluated. Of these, one or more violations were found on 8,041 pages, or 72.9%. This number is decreased from 9,292, or 83.8%, previous year. There were 74,222 violations found overall. The table below shows how these are distributed by relative severity.

High Severity Violations	34,470	(46%)
Medium Severity Violations	9,994	(13%)
Low Severity Violations	29,758	(40%)
Total Violations	74,222	

This table shows how these numbers compare to last year's assessment:

	2011	2012	Difference
High Severity Violations	55,210	34,470	↓ 38%
Medium Severity Violations	11,533	9,994	↓ 13%
Low Severity Violations	48,248	29,758	↓ 38%
Total Violations	114,991	74,222	↓ 35%

The elimination of 40,769 violations from the websites surveyed—a 35% reduction—in one year's time represents a remarkable progress, and stands as a strong testament to the work being done in these agencies.

To provide some characterization of the violations most prominent in the assessment findings, the following tables highlight the top violations, as ranked by different metrics in the AMP analysis: violation frequency, severity, and estimated ease of remediation.

***Most frequent violations (by pages affected)***

<b>Best Practice</b>	<b>Violations</b>	<b>Percentage of Pages with Violation</b>	<b>Severity</b>	<b>Noticeability</b>	<b>Repair Effort</b>
Ensure the language of a document is set	3,726	32%	1	6	2
Provide valid labels for form fields	7,763	28%	10	6	2
Avoid the sole use of device dependent event handlers	16,514	18%	8	7	2
Ensure heading elements are properly ordered	8,374	17%	3	6	4
Provide alternative text for images	6,928	14%	10	10	2

***Most frequent violations (by violation count)***

<b>Best Practice</b>	<b>Violations</b>	<b>Percentage of Pages with Violation</b>	<b>Severity</b>	<b>Noticeability</b>	<b>Repair Effort</b>
Avoid the sole use of device dependent event handlers	16,514	18%	8	7	2
Avoid unnecessary use of heading elements	15,942	10%	3	3	2
Ensure heading elements are properly ordered	8,374	17%	3	6	4
Ensure keyboard focus is only assigned to elements that are defined as keyboard focusable without setting a tabindex	8,035	7%	6	5	4
Provide valid labels for form fields	7,763	28%	10	6	2

***Most severe violations***

<b>Best Practice</b>	<b>Violations</b>	<b>Percentage of Pages with Violation</b>	<b>Severity</b>	<b>Noticeability</b>	<b>Repair Effort</b>
Provide alternative text for images	6,928	14%	10	10	2
Provide valid labels for form fields	7,763	28%	10	6	2
Ensure headers and cells are properly associated	14	0%	10	7	4
Avoid utilizing sub-tables in header elements	50	0%	9	3	5
Avoid the sole use of device dependent event handlers	16,514	18%	8	7	2
Ensure image buttons provide alternative text	252	2%	8	6	3
Embed Flash Player content in a manner that exposes accessibility	255	0%	8	7	4

***Violations requiring least remediation effort***

<b>Best Practice</b>	<b>Violations</b>	<b>Percentage of Pages with Violation</b>	<b>Severity</b>	<b>Noticeability</b>	<b>Repair Effort</b>
Provide alternative text for images	6,928	14%	10	10	2
Provide valid labels for form fields	7,763	28%	10	6	2
Avoid the sole use of device dependent event handlers	16,514	18%	8	7	2
Ensure frame titles are meaningful	991	4%	7	6	2
Provide valid, concise, and meaningful alternative text for image buttons	252	2%	6	8	2
Ensure the language of a document is set	3,726	32%	1	6	2
Avoid unnecessary use of heading elements	15,942	10%	3	3	2
Ensure hr elements utilize relative sizing	40	0%	4	2	2
Ensure option elements in large lists are grouped	821	6%	1	2	2

**Interpretation of Results**

There remains, unfortunately, a notable correlation between the most common violations and the most severe. On the other hand, the level of effort required to fix is generally relatively low for these violations, representing the potential for improvement.

Most notable is comparison of these figures to last year’s. One item, instances of violations of “Avoid utilizing sub-tables in header elements,” went up from 15 to 50, both marginal quantities in this context. Aside from that one exception, however, *the numbers of violations in every single one of these categories decreased*. The progress reflected in this first year-to-year comparison of AMP data is highly commendable.

**Three Year IT Management and Budget Plans**

In addition to the AMP evaluation, this year the instructions for submission of the Agency Three Year IT Management and Budget Plan documents (which are required annually by the Kansas Legislature and ITEC to present a high-level view of IT activities in the state) included questions asking whether agencies have completed website accessibility assessments. Responses are summarized in the tables below:

***Completed an external web site assessment***

Yes	68%
In progress	2%
No	28%
Did not answer	2%
No web site	0%

***Completed an internal web site assessment***

Yes	30%
In progress	4%
No	32%
Did not answer	8%
No web site	26%

## OUTLINE OF 2013 PLANNED INITIATIVES

While progress was made on a number of initiatives in 2012, significant work lies ahead. The following sections outline the Partnership's planned areas of focus for the coming year.

### Governance

The Partnership will continue to track ongoing federal efforts to update IT accessibility standards—such as the ICT Standards and Guidelines, the Notice of Public Rulemaking (NPRM) for which is expected in 2013—as well as emerging industry standards—such as PDF/UA (PDF/Universal Accessibility, ISO/FDIS 14289-1)—to understand their impact on activities in the state and recommend approaches for compliance, reflection in state standards, etc. We will examine the federal Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act for ways it might inform our own strategic planning for accessibility.

We will also continue to focus on facilitating agencies' integration of accessibility evaluation into the technology procurement process. Having established a process for doing so for planned IT projects subject to ITEC Policy 2400, *Project Approval*, we will explore possibilities to similarly address other procurements of technology that fall outside this process. (Some preliminary discussions on this topic were held in 2012, but further study is required for any effort to get underway.)

### Assistance

Training will be developed on proper development techniques for producing accessible content, as well as for identifying and addressing existing accessibility issues. Offerings will aim to provide a general foundation in accessible content creation as well as target specific areas of common need as identified by the enterprise-wide assessment effort.

PDF, the Portable Document Format, is a particular technology on which we intend to focus this year, especially given our newfound understanding of its prevalence on State websites. Activities will involve expanding the scope of information resources we make available, including the aforementioned training, and exploring possible PDF accessibility tool offerings.

### Communication

With a wide user base for AMP now in place, we will act on common feedback and form a user group for users of the assessment tool, and webmasters in general, to improve engagement with this key stakeholder group on whom many of the tasks necessary for implementation of web accessibility standards fall. We hope that such a group will be an effective mechanism for providing support, and would generally foster a sense of community around the subject of web accessibility.

In support of our efforts involving accessibility in procurement processes, we will try to establish contacts with accessibility executives for some of the major software vendors with which agencies commonly do business to raise awareness and understand the state of their accessibility efforts.

## Assessment

Continuing use and support of AMP is now one of the KPAT's primary efforts. In addition to promoting agency use of the tool, putting it to use in beginning a more comprehensive program of systematic, enterprise-wide assessment of state websites as a whole will be undertaken. In addition, as mentioned above, we will research possibilities for supplementing the HTML-based web content assessment capabilities of AMP with some similar tool for PDF content.

By working closely with state agencies in making an automated tool available for self-assessment, we hope to assist them in identifying strategies for compliance, developing plans for remediation where required, and to identify opportunities for training and best practice sharing that will increase the accessibility of the information and services delivered electronically by the state.

## APPENDIX

### Kansas Partnership for Accessible Technology Membership Listing

#### *Chair*

**Duncan Friend**  
**Director of Enterprise Technology Initiatives**  
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Vacant  
**Kansas Department of Administration -**  
**Procurement and Contracts**

Vacant  
**Kansas Department for Aging and Disability**  
**Services**

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**Kansas Department of Education**

Vacant  
**Kansas Department of Health and**  
**Environment Division of Health Care**  
**Fincance**

# APPENDIX

## Executive Order 08-12

**EXECUTIVE ORDER 08-12**

**WHEREAS**, the State of Kansas is committed to ensuring that all of its citizens have the opportunity to lead full lives of independence, productivity, and self-determination, without regard to their disabilities; and

**WHEREAS**, in order to do so, it is important that the state's electronic and information technology systems are accessible to persons with disabilities, so that all Kansans can fully participate in and enjoy the benefits of state services, programs, employment, and opportunities; and

**WHEREAS**, Information Technology Policy 1210 established in 2000 accessibility requirements for all web-based services, applications, and information available on state internet/intranet/extranet servers, including services that are developed internally, developed via contract, provided by third parties on behalf of state organizations, or purchased products; and

**WHEREAS**, the removal of all barriers to equal opportunity for all Kansans requires the leadership and the concentrated and continued attention of the state administration to build upon this important foundation; and

**WHEREAS**, Kansas state government is a complex combination of organizations and functions providing a wide variety of services to citizens and other customers; and

**WHEREAS**, Article 1, § 4 of the Constitution of the State of Kansas vests in the Governor the power to require information from the officers of the executive department upon any subject related to their duties.

**NOW, THEREFORE**, pursuant to the authority vested in me as Governor of the State of Kansas, I hereby establish the Kansas Partnership for Accessible Technology ("Partnership") with the following purposes and charges:

1. The Partnership shall address web and information technology accessibility issues and provide policy, standards, guidelines, or procedural recommendations to the Information Technology Executive Council.
2. The Partnership shall coordinate, review, and provide recommendations on programs for enterprise wide assessment and monitoring of accessibility compliance.
3. The Partnership shall review annually and modify as required the State of Kansas Web Accessibility Requirements (Information Technology Policy 1210), and related documents (e.g., the State of Kansas Web Content Accessibility Guidelines), in response to any pertinent advances in technology and/or changes in federal accessibility standards.
4. The Partnership shall develop and provide information, training, support, and resources on web and information technology accessibility to agency web and information technology implementers and other stakeholders.
5. The Partnership shall aim to establish a leadership role for Kansas in the national effort to improve access to and use of information and services by individuals with disabilities.
6. The Partnership shall be a standing advisory committee to the Information Technology Executive Council, and other committees, boards and commissions as appropriate, and shall provide a copy of its annual report to the Council, as well as to the Governor and Legislature.

7. The Partnership membership shall consist of up to thirty (30) members as follows:
  - a. The Director of Statewide Web/IT Accessibility;
  - b. The State ADA Coordinator;
  - c. The Executive Director of the Kansas Commission on Disability Concerns;
  - d. The Director of the Department of Administration Division of Purchases;
  - e. The Chief Information Technology Architect;
  - f. The Executive Branch Chief Information Technology Officer, or designee;
  - g. The Legislative Branch Chief Information Technology Officer, or designee;
  - h. The Judicial Branch Chief Information Technology Officer, or designee;
  - i. The Executive Director of the Information Network of Kansas;
  - j. The State Archivist, or designee;
  - k. The State Geographic Information Systems Director;
  - l. A representative from the Kansas Department of Social and Rehabilitation Services;
  - m. A representative from the Kansas Department on Aging;
  - n. A representative from the Division of Information Systems and Communications;
  - o. A representative from the Kansas State Department of Education;
  - p. A representative from the Regents Information Technology Council of the Kansas Board of Regents;
  - q. A representative from Kan-ed;
  - r. A representative from the Kansas Health Policy Authority;
  - s. A representative from the Kansas Division of Emergency Management;
  - t. A representative from Kansas Relay Services, Inc.;
  - u. Up to ten (10) appointments by the Governor from among the following categories. These members shall serve at the pleasure of the Governor.
    - i. County government;
    - ii. Local government;
    - iii. The Kansas State School for the Blind;
    - iv. The Kansas School for the Deaf;
    - v. Disability advocates from the private sector;
    - vi. At-large.
8. The Governor shall select a Chairperson and Vice-Chairperson from among the members who shall serve for one year and thereafter be elected by the Partnership. The Partnership may elect other officers among its members and may establish any committees deemed necessary to discharge its duties.
9. Members of the Partnership, including officers and employees who are appointed to the Partnership, may receive subsistence allowances, mileage and expenses as permitted by law.
10. For administrative purposes, the Partnership shall be housed in the Division of Information Systems and Communications. The Partnership shall receive staff support from the Director of Statewide Web/IT Accessibility.
11. The Partnership shall work jointly with officials from other state agencies, organizations and county, municipal and tribal governments, as well as with businesses and organizations in the private sector whose products, services, or activities affect the accessibility of state services, programs, or systems.

This document shall be filed with the Secretary of State as Executive Order No. 08-12 and shall become effective immediately.