



**OPEN DATA
AND
WEB SITE POLICY**

**CITY OF FORT WORTH
INFORMATION TECHNOLOGY SOLUTIONS DEPARTMENT
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1.0 VISION AND MISSION

Vision:

To make City of Fort Worth government transparent to the citizens by providing information that is publicly available to everyone.

Mission:

- To undertake a leadership role in the oversight of the public website and open data portal. This includes identifying best practices and processes to be aligned with the goals of the organization.
- To provide expert advice and support in relation to all aspects of Website and Open Data Governance including Data Ownership, Data Protection, Data Privacy, Information Usage, Classification, and Retention.
- To promote Website and Open Data Governance at an executive and senior management level.

2.0 INTRODUCTION TO OPEN DATA POLICY

Information is a valuable resource and a strategic asset to the City of Fort Worth, its partners, and the public. To that end, the City of Fort Worth requires a strategic Open Data Policy that follows current standards and is flexible enough to provide for future development. It is the City's policy that public data will be made open and freely available to all online. The City is committed to transparency and accountability.

2.1 OPEN DATA POLICY OBJECTIVES

The primary goal of the Open Data policy is to achieve publically available data structured in a way that enables the data to be fully discoverable and usable by end users. The City's Open Data Portal will be consistent with the following data principals:

1. *Accessible*
2. *Complete*
3. *Licensing*
4. *Machine Readability*
5. *Non-Discriminatory*
6. *Non-Proprietary*
7. *No Usage Cost*
8. *Primary*
9. *Timely*

3.0 INTRODUCTION TO WEBSITE POLICY

The City of Fort Worth website is the digital front door for residents to access the City's resources and data. Consequently, consistency throughout the website is vital to the city's electronic image. In addition, it is of paramount importance that the City of Fort Worth website and all its sub-sites be maintained according to best practices and at the highest quality possible.

3.1 WEBSITE POLICY OBJECTIVES

The primary goal of the website governance policy is to achieve a consistent look and branded tone in the delivery of digital services regardless of the department developing the content.

Supporting this objective, the city's website will take a resident-centric approach, rather than a departmental or organizational structure, to all web pages and web-based applications.

The website and supporting applications and services must be arranged in a way that intuitively presents information to users, regardless of how the city's structure is arranged, and to manage delivery of those services.

4.0 DEFINITIONS AND PRINCIPALS

In October 2007, thirty open government advocates met in Sebastopol, California to discuss how government could open up electronically-stored government data for public use. The following principals and definitions, for open data, are a result of this meeting and have been adopted as standards for government organizations:

Accessible:

Datasets/Website content released by the government should be as accessible as possible, with accessibility defined as the ease with which information can be obtained, whether through physical or electronic means. An aspect of accessibility is also the ability to easily locate and download content. Barriers to physical access include requirements to visit a particular office in person or requirements to comply with particular procedures (such as completing forms or submitting FOIA requests). Barriers to automated electronic access include making data accessible only via submitted forms or systems that require browser-oriented technologies (e.g., Flash, Javascript, cookies or Java applets). By contrast, providing an interface for users to download all of the information stored in a database at once (known as "bulk" access) and the means to make specific calls for data through an Application Programming Interface (API) make data much more readily accessible. All sites/applications should adhere to the Section 508 Accessibility Act.

Complete:

Datasets/Website content released by the government should be as complete as possible, reflecting the entirety of what is recorded about a particular subject. All raw information from a dataset should be released to the public, except to the extent necessary to comply with federal law regarding the release of personally identifiable information. Metadata that defines and explains the raw data should be included, as well as, formulas and explanations for how derived data was calculated. Doing so will permit users to understand the scope of information available and examine each data item at the greatest possible level of detail.

Data:

Final versions of statistical and factual information collected for reference or analysis:

1. *In alphanumeric form reflected in a list, table, graph, chart or other non-narrative form, that can be digitally transmitted or processed.*
2. *The quantities, characters, or symbols on which operations are performed by a computer, being stored and transmitted in the form of electrical signals and recorded on magnetic, optical, or mechanical recording media.*
3. *Things known or assumed as facts, making the basis of reasoning or calculation.*

Data Set:

A named collection of related records on a storage device, with the collection containing individual data units organized or formatted in a specific and prescribed way, often in tabular form, and accessed by a specific access method that is based on the data set organization.

Licensing:

Data is not subject to any copyright, patent, trademark or trade secret regulation. Reasonable privacy, security and privilege restrictions (such as HIPPA and CJIS) will be allowed.

Machine Readability:

Machines can handle certain kinds of inputs much better than others. For example, handwritten notes on paper are very difficult for machines to process. Scanning text via Optical Character Recognition (OCR) results in many matching and formatting errors. Information shared in the widely-used PDF format, for example, is very difficult for machines to parse. Whenever possible, information should be stored in widely-used file formats that easily lend themselves to machine processing. These files should be accompanied by documentation related to the format and how to use it in relation to the data. For Website content, the content should be accessible by tools for users with disabilities, such as JAWS for seeing-impaired users.

Metadata:

Contextual information that makes the public data sets easier to understand and use.

Non-discriminatory:

"Non-discrimination" refers to who can access data and how they must do so. Barriers to use of data can include registration or membership requirements. Non-discriminatory access to data means that any person can access the data at any time without having to identify him/herself or provide any justification for doing so.

Non-proprietary:

Data should be available in a format over which no entity has exclusive control. For example, if only one company manufactures the program that can read a file where data is stored, access to that information is dependent upon use of the company's processing program. Sometimes that program is unavailable to the public at any cost; or is available, but for a fee. Freely available alternative formats often exist by which stored data can be accessed without the need for a software license. Removing this cost makes the data available to a wider pool of potential users.

No Usage Costs:

Data should be available to the public at no cost. One of the greatest barriers to access of publicly-available information is the cost imposed on the public for access: even when the cost is minimal. Imposing fees for access skews the pool of who is willing (or able) to access information. It also may preclude transformative uses of the data that in turn generates business growth and tax revenues.

Open Data:

Publicly available data structured in a way that enables the data to be fully discoverable and usable by end users.

Open Standard:

A technical standard developed and maintained by a voluntary consensus standards body that is available to the public without royalty or fee.

Primary:

Dataset and website content released by the government should be primary source data. This includes the original information collected by the government, details on how the data was collected, and the original source documents recording the collection of the data. Public dissemination will allow users to verify that information was collected properly and recorded accurately.

Timely:

Dataset and website content released by the government should be available to the public in a timely fashion. Whenever feasible, information collected by the government should be released as quickly as it is gathered and collected. Priority should be given to data whose utility is time sensitive. Real-time information updates would maximize the utility the public can obtain from this information.

5.0 OPEN DATA AND WEBSITE GOVERNANCE

5.1 GOVERNANCE OVERVIEW

The City's Open Data and Website Policies are governed by the following three groups:

Governance Committee

The Open Data and Website Governance Committee is responsible for reviewing website feedback and industry practices to set a strategic direction for website improvements and projects. The Governance Committee will be responsible for being consistent with the following principals:

- Provide direction and vision on how the Open Data Portal can help the city achieve the Mission, Vision, and Values.
- Identify and prioritize high value datasets.
- Create a process to engage with departmental customers to help facilitate and prioritize data release.
- Work with departmental owners to assess overall organizational risk, based on the impact of releasing potentially sensitive data, and make a risk-based determination.
- Ensuring that data released to the public are open, and a point of contact is designated to assist open data use and to respond to complaints about adherence to open data requirements.
- Provide input and direction to the technology and communications groups on issues with the Open Data Portal. In addition, clarify roles and responsibilities for effective data release practices.

Technology Group

The Information Technology Solutions Department is tasked with: a) creating and maintaining the technology infrastructure needed to implement the committee's strategic plan, b) advising the committee to ensure feasibility of selected projects, and c) implementing the development and functionality identified by the committee. The Information Technology Group will be responsible for being consistent with the following principals:

- Implement the software and hardware systems that will host the open data repository.
- Design the data warehouse to hold open data information.
- Set data standards based on best practices.
- Provide metadata and other relevant information to describe the data.
- Provide automated methods for importing and updating data loads.

- Work with owning departments, Legal and Records Management to ensure that privacy and confidentiality are fully protected and system security is maintained.
- Work with departmental owners to assess overall organizational risk, based on the impact of releasing potentially sensitive data, and make a risk-based determination.
- Working with departments to scale best practices in open data practices across the enterprise.

Communications Group

The Communications and Public Engagement Office is tasked with creating a consistent branded identity for city web content and print materials. The Communications office also oversees the website structure, as well as advises IT Solutions and the committee on how to best integrate services into the website and publicize their availability. The Communications Group will be responsible for being consistent with the following principals:

- Communicate and market the strategic value of open data to internal stakeholders and the public.
- Engaging business and innovators in the private and nonprofit sectors to encourage and facilitate the use of agency data to build applications and services.
- Provide branding and graphical resources to the technology group.
- Seek input from the public from businesses and the citizens on what improvements can be made and what data they would like to see.
- Cultivate options in the community for citizen volunteering with the use of open data.

Departments

The City of Fort Worth Departments are tasked with collecting and storing the data in a format that is consistent and accessible for release to Open Data. The Departments will be responsible for:

- Collecting the data that is used to making decisions within their area.
- Identifying the location of the stored data and what is permissible to be released to Open Data
- Accuracy of the data that is being collected.

5.2 QUARTERLY GOVERNANCE COMMITTEE REVIEW PROCESS

The Website and Open Data Governance committee will meet on a quarterly basis and follow the basic process flow below in Figure 1.

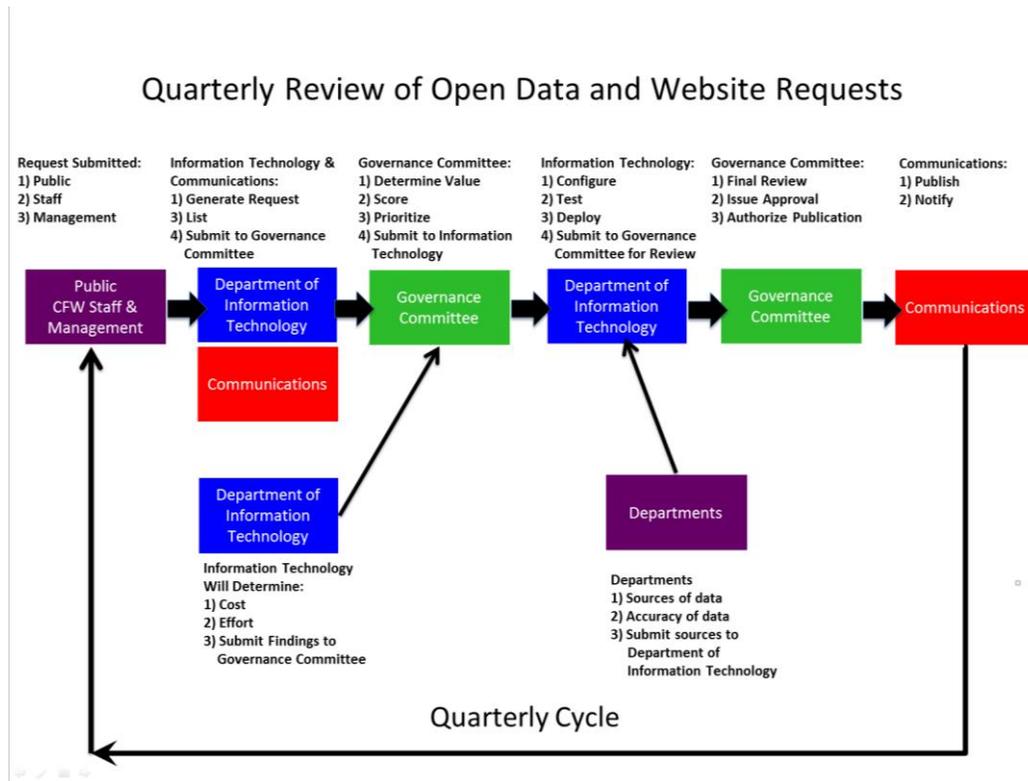


FIGURE 1: QUARTERLY REVIEW OF OPEN DATA AND WEBSITE REQUESTS.

5.3 GOVERNANCE COMMITTEE TEAM MEMBERS

The Website and Open Data Governance team will consist of the following members:

Community & Public Engagement Director, City Manager's Office
Senior Assistant City Attorney Sect Chief, Legal
Records Manager, City Secretary
Assistant Planning/Development Director, Planning & Development
Customer Service Administrator, Code Compliance
Program Support Division Administrator, Police
Chief Performance Officer, City Manager's Office
Assistant Director, Water Department
Community Services Manager, City Manager's Office
Assistant Library Director, Library
Budget Manager, Budget
Senior IT Manager, IT Solutions (Facilitator only)

5.4 GOVERNANCE COMMITTEE MEETINGS

The Governance Committee will meet once a quarter and committee members must attend or assign a delegate with authority to make decisions on their behalf.

Meetings will consist of reviewing new versions/releases of the Website, Open Data Program, and any other system that may be providing information to the public. In addition, the committee will review new requests that have come in for changes and/or new data sets; as well as offer up any suggestions that may have received by them during interactions with the public.

5.5 GOVERNANCE COMMITTEE ACCOUNTABILITY MECHANISMS

The Governance Committee should always lean in favor of openness. To do this effectively, they need information on how the website, related applications, and corresponding datasets are performing. The Technology Group and Communications Group will work together to provide the following:

- Periodic data quality review by the technology and communications groups with a report back to the governance committee .
- Report to the Governance Committee on the traffic to the sites and statistics on dataset activity.
- Periodic reporting on activities that the Technology and Communications Groups are doing to support and promote Open Data.
- Annually review and where appropriate, revise existing policies and procedures to strengthen data management and release practices.

5.6 GOVERNANCE COMMITTEE ROLES AND RESPONSIBILITIES

Stewardship for Website and Open Data:

1. Coach the organization's management team in the value and implications of information.
2. Drive initiatives to improve and assure the business value of information in terms of quality, efficiency, usability, and interpretation
3. Develop organizational policy describing how data information should be treated; and how ownership responsibilities and accountabilities can be established and monitored.
4. Direct, manage, and facilitate the Website and Open Data structures to optimize the exploitation of data and compliance to corporate and regulatory requirements in consultation with Senior Management, business unit representatives, and other stakeholders.
5. Drive organizational and behavioral change as it relates to the making of data public for the citizens and businesses of Fort Worth.
6. Provide stakeholders with guidance, standards, and consultation to enable stakeholders to develop common and accepted data definitions for all data released publicly,
7. Craft Service Level Agreements with relevant staff members to underpin governance practices and expectations and ensure data are collected, stored, shared and reported accurately and according to the needs of the organization and citizens.
8. Establish effective communication channels with Business Domain Owners, data owners, and stewards to facilitate exchange of ideas that build continuous improvement in Web and Open Data governance and management practices across the organization
9. Drive explicit understanding of the value to be derived from the City of Fort Worth's Open Data policy.

Prioritization of Requests and Changes

1. Drive initiatives to improve and assure the business value of information in terms of quality, efficiency, usability and interpretation
2. Establish and operate the Website and Open Data Plan, score and set priorities for associated data governance activities
3. Recognize areas where existing practices require change or where new ones need to be developed to ensure Website and Open Data Governance objectives are met
4. Motivate and lead the Website and Open Data Governance Team to build an effective Website and Open Data Management Framework tailored to the needs of the organization.
5. Ensure the consistent implementation of best practice for releasing information and data quality through benchmarking, business process improvement, and customer feedback

Adherence to Data Standards/Policies

1. Verify and validate that data releases are adhering to the Website and Open Data Governance Principals.
2. Identify data owners and stewards and implement ownership responsibilities as corporate policy. In time, policy is to cover all data and information that is shared or of significant value (both “structured” and “unstructured”, including requirements for document and records management).
3. Establish a Data Quality Framework of policies, processes, quality measures, information standards, and requirements
4. Define, agree, and communicate the roles and responsibilities of Business Data Owners, Data Quality Managers, and Data Steward.
5. Define, establish and support the operation of metadata management, business glossary and information modelling practices which drive shared communication and understanding of information meaning and improved trust and integrity for information.
6. Ensure the consistent implementation of best practice for releasing information and data quality through benchmarking, business process improvement, and customer feedback
7. Validate that website, open data program, and any other public facing application adheres to the City of Fort Worth’s Style Guide.
8. Validate that website, open data program, and any other public facing application adheres to the City of Fort Worth’s Branding.

Enhanced functionality to meet customer needs

1. Together with IT function, develop a model for making data public that incorporates common practices for the consistent definition of data terms, business rules and taxonomies, with a common method for storage and retrieval of common data definitions.
2. Develop robust Website and Open Data practices that facilitate compliance with regulations and are understood and accepted by stakeholders.
3. Seek out program, process and technological improvements/innovations that will:
 - a. Foster improved data quality and reporting.
 - b. Balance access to information with the need for security of data.
 - c. Eliminate redundancies and create consistency.
 - d. Improve the reliability, accuracy, and confidence in the data released.

6.0 OPEN DATA AND WEBSITE PRIORITIZATION OF REQUESTS

The committee will review the suggestions and determine if there is a need to create a project and prioritize it. The suggestions/recommendations themselves will not be scored, but rather projects/initiatives that are determined by the committee.

Scoring:

Scoring of initiatives/projects identified by the Governance Committee will be based off the following criteria:

Value:	High Value (5), Medium Value (3), Low Value (1)
Cost:	Low/No Cost (5), Medium Cost (3), High Cost (1)
Risk:	Low/No Risk (5), Medium Risk (3), High Risk (1)

Value:

Prioritizing and releasing valuable data through public engagement is a priority and a City of Fort Worth goal. Identifying and engaging with key data consumers to help estimate the value of the multitude of federal datasets can help City of Fort Worth prioritize those of highest value for quickest release, where appropriate.

Importance:

To determine the importance of a dataset, the City of Fort Worth should engage the public, management, and internal employees to gather feedback for identifying stakeholders and value drivers of the data. This will allow the City of Fort Worth to estimate the potential impact that the data will have on its customer groups, internal staff and society at-large. Value from public access to data may come in unanticipated and unexpected ways once the data is released. The following is a list of foundational questions that agencies may consider when determining the value of releasing a dataset:

Stakeholders

- 1) Who are the current or future internal and/or external users?
- 2) Who are the external businesses/developers?
- 3) What is the estimated number of users?
- 4) Is the data of short- or long-term value to stakeholders?
- 5) How frequently might the dataset be consumed?
- 6) How much value is derived from each data interaction?
- 7) Are there any limitations on data analysis and use?

Value Drivers

- 1) Is the data currently used to enable the performance of City of Fort Worth functions or support the City of Fort Worth's mission?
- 2) Is the data leveraged in decision making within or outside of the City of Fort Worth?
- 3) Does the data increase internal government efficiency?
- 4) Does the data improve the effectiveness of government programs?

- 5) What is the potential of the data to fuel innovation (e.g., enable the development of new tools)?
- 6) If used by secondary users, what is the potential of the data to lower costs?
- 7) What is the potential of the data to create economic value or growth?
- 8) What is the potential of the data to open up new business opportunities?
- 9) What is the potential of the data to catalyze new collaboration efforts?

Cost:

Through considering the following questions, City of Fort Worth can begin to assess the cost of preparing data for release and maintaining the data once made public. City of Fort Worth should consider all types of monetary costs that may be incurred (e.g., amount of money required to pay for technology tools, contractor support, new positions, marketing, etc.). In addition to costs impacting operational budgets, the number of employees and the amount of time each spends dedicated to open data tasks should also be considered, as well as the tasks not being completed because resources have been reallocated to open data efforts. Any resource required for preparation and maintenance should be included in order to have a comprehensive understanding of cost.

Format:

- 1) Will the format of the data need to be converted in order to share or use the dataset?
- 2) Are there definitions for the data within the dataset that ensure understanding of the data?
- 3) What is the estimated overall cost for data preparation?
- 4) What is the estimated time to prepare the data for release?

Frequency:

- 1) How will changes be identified after the initial publication?
- 2) How frequently will the data require a refresh?
- 3) What is the estimated overall cost for data maintenance?

Review:

- 1) Are there required processes in order to share the data?
- 2) How significant is the involvement of the legal department?
- 3) Are there regulatory (e.g. privacy, security, accessibility, etc.) concerns associated with sharing the data?

Operations and Maintenance:

- 1) What organizations will commit human and financial resources to sharing the data?
- 2) What are the additional lifecycle costs for data sharing?
- 3) What additional technology resources will be needed?

- 4) What system changes need to be implemented in order to share the data? What is the estimated cost?
- 5) Will sharing the data require additional hosting capacity or a different hosting technology?
- 6) Would de-identifying the data eliminate its utility?
- 7) Is a process in place for collecting public feedback on the data and what is the associated cost of maintaining that process?

Data Sharing:

The City of Fort Worth needs to be aware of the risk and unintended consequences associated with sharing their data. When assessing the risks associated with sharing data, City of Fort Worth should consider existing policies such as the Privacy Act of 1974, the E-Government Act of 2002, the Federal Information Security Management Act of 2002 (FISMA), Health Insurance Portability & Accountability Act (HIPPA) or 1996, Controlled Unclassified Information (CUI) and Confidential Information Protection and Statistical Efficiency Act (CIPSEA). Additionally, other regulations (Criminal Justice Information System – CJIS) need to be considered before releasing any data. In order to ensure compliance with these policies and to minimize privacy or security risks associated with releasing the data, the data must be reviewed by City of Fort Worth Attorney’s office prior to being released. Additional questions to help guide this process are included below which are intended to assist agencies in thinking about risk generally. These questions may be addressed specifically or generalized through one or more aggregate proxy measures if not practical to answer.

Privacy and Unintended Consequences:

- 1) Will the release of the data have any unintended consequences (e.g. discrimination against an individual / group, release of protected health information, or the mosaic effect)?
- 2) Does the data pose a security risk when combined with currently available information?

Security:

- 1) Does the data disclose information regarding the security of government information or communications systems?
- 2) Does the data disclose information regarding physical security of government facilities (owned or leased)?
- 3) Does the data disclose detailed critical infrastructure information?
- 4) Does the data disclose any personal identifying information?
- 4) Does any of the data fall under the Health Insurance Portability & Accountability Act (HIPPA) Act?
- 5) Does the data fall within the Criminal Justice Information System (CJIS) regulations?

Other Considerations:

- 1) Is the source of the data credible?
- 2) What are the potential consequences from the data being misinterpreted?
- 3) Are there international, foreign, or other restrictions limiting the release of data?

7.0 OPEN DATA AND WEBSITE POLICY GUIDELINES

7.1 OPEN DATA POLICY GUIDELINES

Data Repository

1. The Open Data Portal will act as the central repository of publicly available data for the city of Fort Worth. This will ensure consistency in data inquiries across applications and sources.
2. All data will need to be scrubbed prior to official release into the repository to decrease the amount of blank or null entries and to ensure completeness. It will also be checked for privacy and security concerns, as well as comprehensive affect with other data that has already been released.
3. Data in the portal will be available in machine readable and human readable formats, and include metadata to the fullest extent possible.
4. Data will need to be maintained at its source by the responsible department and have an automated update schedule.
5. Data will be provided with open licenses, such as Creative Commons Attribution 4.0 International.
6. Data will be released with the focus on how the end users may consume the data and what some of the potential use cases are.
7. Data will be released in a regular cycle to continually engage the public and maintain interest. The emphasis will be on releasing new high quality data over quantity of data.

System Design

1. The system design must be scalable, flexible, and facilitate extraction of data in multiple formats and for a range of uses as internal and external needs change.
2. The system will use responsive design to be easily consumed on any device.
3. If the system requires uses not accounted for in the original design, the governance committee can direct a re-evaluation of the system.
4. Google Analytics will be utilized to track statistics on the main website and applications while the open data system will be used to track statistics on individual datasets.
5. Updates and enhancement requests will be reviewed and directed by the governance committee.

7.2 WEBSITE POLICY GUIDELINES

Design Changes

IT Solutions is responsible for setting technical requirements for templates and stylesheets. Communications is responsible branding and the layout of the website (look and feel).

IT Solutions Change Management procedures will be followed to ensure changes don't have negative impacts on existing pages (IT Solutions responsibility) and that the changes fit within the branding guidelines (Communications).

Content Management System

All content will be managed using the same content management system, determined in collaboration with Communications and IT Solutions based on workflow and technology needs. No other software product may be used within FortWorthTexas.gov or associated sites.

Site Taxonomy and Navigation

The Communications and Public Engagement Office will determine how content should be organized and how navigation should be set up. All navigation must adhere to the resident-centric, non-departmental model.

Quality Control

The Communications Office is responsible for identifying website editors and ensuring content adheres to branding and style guides.

Additionally, all content should adhere to these rules:

1. Pages should have all necessary metadata and use clear language. All jargon and special terms must be defined in context and pages should be written for a 10th grade level or below on readability scoring systems.
2. All content requests must be made by employees empowered by the department approve the content in the request. All legal and administrative clearances for release of the information should be complete prior to requesting a post or update.
3. Any given piece of content should be the only source for that information on the site. If content must be repeated on multiple pages, it must be editable in one location. Duplicative content should be eliminated where possible to ensure clear navigation.
4. Updates should be made in a timely fashion, and all content must be as current as possible. Any pages that require changes should be reported as soon as possible to ensure accuracy.
5. All content should be reviewed at least every six months unless a known update date is set at time of posting or during an update. The webmaster will track content review and notify subject matter experts when updates are past due.

6. All content should be easily discoverable and usable regardless of physical ability. Content should be provided in plain text or have a plain text equivalent in all cases. See the accessibility section for more information.
7. All content should be provided in the format best for user consumption. Examples include, but are not limited to:
 - a. Presentations should include voiceover and/or a transcript of the speaker's comments. Providing only the slides for a presentation is incomplete.
 - b. A PDF or image of a flier is prohibited. Instead, an event page, news posting or calendar entry with supporting images should be created.
 - c. Report documents and agendas may be provided in PDF format, but authors should do their due diligence in ensuring the documents are accessible and navigable on computers and mobile devices.
8. All content is subject to review and editing to match city style and branding. Legally required language must be set apart from regular text.
9. New pages and content must be reviewed by the subject matter expert and at least two Communications staff members, including the webmaster. Approval of the subject matter expert and editor is sufficient for content updates, but at least two total people should see an updated page before publishing.
10. All images should identify the rights holder if it does not belong to the city.

These rules apply to content in the content management system as well as content in standalone applications and sites maintained by city staff.

7.3 MOBILE APPLICATIONS

As with the website, mobile applications must adhere to brand standards and the resident-focused structure. Requests for applications must be reviewed by the Web and Data Governance Committee prior to purchase or development, and requesting departments must work with IT Solutions and the Communications and Public Engagement Office to ensure that the functionality adheres to the same standards and structure as the website.

7.4 MEASUREMENT

Google Analytics has been embedded in all site pages. Departments that wish to utilize this data should request an account for their own access and reporting needs.

7.5 ACCESSIBILITY

All web editors and developers should familiarize themselves with and follow the Section 508 of the Americans with Disabilities Act as well as the World Wide Web Consortium's Web Content Accessibility Guidelines 2.0.

All website content and applications should seek to achieve the greatest accessibility level possible, but must meet at least Level AA of WCAG 2.0.

Tools such as WebAIM's WAVE or SiteImprove's Accessibility Checker may be used to identify potential problems, but potential error should be verified by a staff member with accessibility training to locate false positives and log actual issues that need correction.