

4 Steps to Ensure Electronic and Information Technology Accessibility 09.10.2015

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Please find a list below of additional resources from the “*4 Steps to Ensure Electronic and Information Technology Accessibility*” webcast. These resources will help you evaluate the state of your EIT compliance and start building a strategic plan to make your instructional and informational technologies more accessible. If you wish to print only certain resources, you may click their respective links to jump directly to them in the packet.

Pre-Webcast Resources

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Questions to guide the planning process

1) Is there a publicly published approach to accessibility compliance?

Accessibility is a system wide obligation. Access to technology and instructional materials for individuals with disabilities is the same as physical accessibility and available at the point of “Access” or delivery as that provided to persons without disabilities.

2) Are there policies and/or procedures for accessible technology and instructional material?

The systems should adopt policies and procedures that embrace our ADA/504 obligation to provide access to technology and instructional material. Compliance expectations and requirements need to be implemented on a system and institutional level and those policies and procedures should specifically identify who is responsible for implementation, assessment and enforcement. Including approving exceptions and associated means of alternative access in those rare instances where no accessible product is available that will meet the essential academic needs for the product in questions.

3) Are there policies and/or procedures for third party vendor relationships?

The system and institutions should not enter into agreements with third parties providing for the delivery of services, technology, programs and instructional materials without investigating the degree of access afforded individuals with disabilities. It must be assured either that there is full accessibility or that Equal Access is otherwise achieved. Instructional material vendors, including textbook publishers, should provide the system central repository or institution with an accessible alternative media/technology, if the original is print or non-accessible material/technology, at the time of initial adoption by an institution.

4) Are there resources?

The system should provide institutions the necessary support and resources to achieve compliance. Such steps may include developing central resources for alternative format media development and repository or outsource such support to existing facilities. As well as, employing individuals who have the necessary expertise regarding accessible instructional materials and technology; adaptive and assistive technology; including accessibility strategies and needs at the planning and design of significant projects; implementing processes and procedures to achieve compliance strategies; investing the necessary resources to fund accessibility projects; and providing necessary training and guidance to content developers/participants.

Checklist for planning process

Develop a strategic plan for access that is integrated with the system's / institution's overall technology plan. Also develop instructional material creation and adoption policies / procedures that include time frames for replacing inaccessible technology and instructional material and provide opportunities to reprioritize based on ongoing feedback from persons with disabilities.

Policy, standards, and timelines

- Adopt the general accessibility policy statement at system institutions
- Identify a functional standard for access - "substantially equivalent ease of use in the same place and at the same time as others"
- Identify a technical standard for access

Audit

- Develop manageable timelines to meet goals and monitor progress
- Institutions should review their current use of technology, web-based tools, and instructional material for accessibility
- Identify workarounds, accommodations, and supports to address short-term access gaps

Creation / Remediation

- Train content and technology developers/managers – administration/faculty/staff
- Develop remediation strategies with timelines
- Clarify responsibilities, time lines and resources

Procurement

- Develop purchasing requirements with standards and testing

Review

- Review minimum technical and functional accessibility standards every three years for updates to adapt to emerging technologies
- Implement an ongoing review process for new and existing instructional material and technology accessibility

Enforcement

- Develop an enforcement incentive/consequence for non-compliance

Internal Resources

Resources for risk assessment and policy development

- **ADAAA & Section 504**
<http://www.ncl.org/disability-advocacy/learn-ld-laws/adaaa-section-504>
- **Joint Dear Colleague Letter: Electronic Book Readers (Departments of Justice & Education)**
Letter: <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-20100629.html>
Q&A: <http://www2.ed.gov/about/offices/list/ocr/docs/504-ga-20100629.pdf>
- **IT Accessibility Risk Statements and Evidence**
<http://net.educause.edu/ir/library/pdf/accessrisk15.pdf>

Definitions

(Related to “Instructional Materials and Technology will be Accessible for Persons with Disabilities.”)

- **Instructional Materials**
Items that are created, purchased or identified to serve in instruction and/or communicate information both in the curricular and non-curricular settings of a SYSTEM institution. These items may include, but not limited to, textbooks in bound, unbound, kit or package form, library media (print, non-print, and electronic resources), instructional software content, web/online content and learning objects, E-Books, CD-ROM, DVDs, videos, slides, films and filmstrips, learning laboratories, recordings, manipulatives, consumables and ITV content.
- **"Technology" or "Information and Communication Technology" (ICT)**
Includes information technology, equipment, or interconnected system or subsystem of equipment for which the principal function is the creation, conversion, duplication, automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, reception, or broadcast of data or information. Examples of ICT includes, but is not limited to, internet and intranet websites, electronic content, electronic books and electronic book reading systems, search engines and databases, learning management systems, classroom technology and multimedia, personal response systems ("clickers"), telecommunications products, computers and ancillary equipment, software, mobility devices, information kiosks and transaction machines, videos, IT services, and multifunction office machines which copy, scan, fax documents and emerging technologies.
- **Accessible**
individuals with disabilities are able to independently acquire the same information, engage in the same interactions, and enjoy the same services within the same timeframe as individuals without disabilities, with substantially equivalent ease of use.

- **Equal Access**

ICT or Instructional Materials are Accessible or, in the rare instance when Accessibility it is not technologically feasible to that ICT or Instructional Material, then the separate instructional material or technology must provide equally effective access to the program, activity or information. The alternative format or medium communicates the same information in as timely

a fashion as does the original format or medium. When such exceptions are necessary then the means for alternative access and/or materials must be identified and responsibility for implementation assigned prior to the use of the original format or medium.

- **Disability**

Federal laws define a person with a disability as "Any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment."

Sample standards, models, and policies

- **W3C Accessibility Guidelines and WCAG 2.0 A & AA, WCAG2ICT, Section 508, EPub3, Dear Colleague Letters, etc.**
 - <http://www.section508.gov/>
 - <http://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-section-508-standards>
 - <http://www.w3.org/standards/webdesign/accessibility>
 - <http://www.w3.org/TR/2008/REC-WCAG20-20081211/>
 - <http://www.w3.org/TR/wcag2ict/>
 - <http://idpf.org/a11y>
- **George Mason policies**
 - <http://universitypolicy.gmu.edu/policies/university-information-technology-accessibility/>
 - <http://universitypolicy.gmu.edu/policies/procurement-andor-development-of-administrative-systemsapplications/>
 - Example contract language that is included in all RFP, Addendums and Contracts:
All e-learning and information technology developed, purchased, upgraded or renewed by or for the use of George Mason University shall comply with all applicable University policies, Federal and State laws and regulations including but not limited to Section 508 of the Rehabilitation Act (29 U.S.C. 794d), the Information Technology Access Act, §§2.2-3500 through 2.2-3504 of the Code of Virginia, as amended, and all other regulations promulgated under Title II of The Americans with Disabilities Act which are applicable to all benefits, services, programs, and activities provided by or on behalf of the University. The Contractor shall also comply with the Web Content Accessibility Guidelines (WCAG) 2.0.
- **Ohio State University policies**
<http://www.osu.edu/resources/web/accessibility/>
- **Temple University**
<http://accessibility.temple.edu/>
- **Cal State**
 - <http://www.calstate.edu/library/?source=homepage>
 - http://www.calstate.edu/Accessibility/EIT_Procurement/
- **Association of Research Libraries**
 - http://www.arl.org/news/arl-news/3316-authors-guild-v-hathitrust-implications-forlibraries#.U_NR9UiGij8
 - Direct link to ARL Toolkit: <http://accessibility.arl.org/>