

# Web and IT Accessibility Policy in Higher Education

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# Policies can occur at any level

- Federal
- State
- Institution
- Department or Unit
- Individual

**2011** **EDUCAUSE:**  
**ANNUAL CONFERENCE**  
**THE BEST THINKING IN HIGHER ED IT**

**EDUCAUSE**

# National Federation of the Blind (NFB)

- June 2009 – Sued Arizona State University (and filed OCR and DOJ complaints against 5 others) over use of Amazon Kindle (settled in Jan 2010)
- November 2010 – Filed OCR complaint against Penn State University
- March 2011 – Filed DOJ complaint against Northwestern and NYU over use of Google Apps

# NFB vs Penn State

- Inaccessible library website
- Inaccessible departmental websites
- Inaccessible LMS (Angel)
- Classroom technologies that are inaccessible to blind faculty members
- Inaccessible financial services via contract with PNC Bank

“The disparity between the quality of education offered non-disabled students and disabled students is, as a general matter, increasing, simply because the amount of inaccessible technology on the campus is proliferating... It sounds like a bad problem for the students. But it’s actually a worse one for the colleges and universities, because this is going to have to change.”

Dan Goldstein at EDUCAUSE, October 20, 2011

“Each year that a school delays identifying where its accessibility issues are and developing a plan of action, and each year that a university doesn’t change its procurement policy and continues to acquire new inaccessible technology means that when you do finally decide to do something, it will cost you a great deal more... My goal frankly is to get it to the top of your to-do list, or as near to the top as I can get it.”

Dan Goldstein at EDUCAUSE, October 20, 2011

- “In terms of what to do... ending denial is the first step and saying ‘You know, we’re inaccessible’; and then taking stock of where you are inaccessible; and then coming up with an action plan... It’s important that the plan be public, with deadlines.”



“The one thing you can go back and tell the general counsel is: Dan Goldstein said he’s not going to file any suit if a school has a comprehensive action plan up that says how they’re going to become accessible.”

# IT Policies Galore

- Copyright Policies
- Privacy Policies
- Security Policies
- Acceptable Use Policies
- Policies on Policies
- *“Do we really need another policy?”*

# UW Executive Order No. 4

The University of Washington reaffirms its policy of equal opportunity regardless of race, color, creed, religion, national origin, sex, sexual orientation, age, marital status, disability, or status as a disabled veteran or Vietnam era veteran in accordance with University policy and applicable federal and state statutes and regulations. The University of Washington is committed to providing access and reasonable accommodation in its services, programs, activities, education and employment for individuals with disabilities.

# Reasons to Have a Policy

- To provide guidance to faculty and staff
- To support our requirements that vendors provide accessible products
- To demonstrate our commitment
- To *reduce* legal risk

# Policy Step 1: Prepare

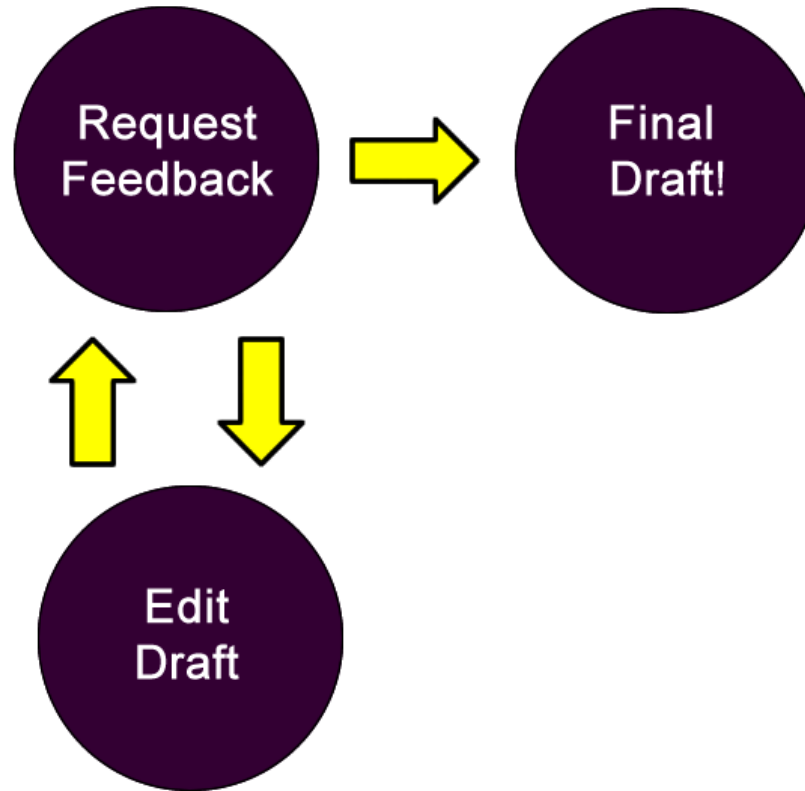
- What problem are you trying to solve?
- How does your institution define policy?
  - Policies, rules, guidelines, procedures
  - Compliance vs aspirational policies
- Which type of policy is best for solving the problem you've identified?
- What are the costs? The benefits?
- Who are the key stakeholders?

# Policy Step 2: First Draft

- Who will write the draft?
  - Written by the content expert (You)?
  - Written by a policy expert (General Counsel)?
  - Written by committee?
- Consult existing policies
  - Other IT policies at your institution
  - Policies at other institutions

<http://uw.edu/accessibility/highedpolicies.html>

# Policy Step 3: Review, Buy-in & Approval



# Policy Step 4: Raise Awareness

- Support model vs. Enforcement model
- Be prepared to provide help, training, & resources
  - Empower the infrastructure
  - Cultivate champions
  - Make friends



# The Policy Path @ NCSU

- Support from friend(s) in high places
  - Vice provost for information technology
  - Vice provost for equal opportunity
  - Office of general counsel
- Input, buy-in, & ownership from affected stakeholders
  - Teaching & Learning with Technology Roundtable (key faculty and staff)
  - Council of the Deans
  - Key individuals across campus

# Policy Timeline @ NCSU

- Began drafting policy in 2000
- Web accessibility regulation issued by the Chancellor in 2006
- Implementation guidelines published in a separate document, also in 2006
- Updated in August 2011 as Information and Communication Technology Accessibility regulation (with built-in procedures)

# NCSU Resources

- Procedure for Formatting, Adopting, and Publishing Policies, Regulations, and Rules (PRR):  
<http://policies.ncsu.edu/regulation/reg-01-25-05>
- Guidelines for Drafting PRR:  
[http://www.ncsu.edu/general\\_counsel/pols\\_regs/prr\\_guidelines.php](http://www.ncsu.edu/general_counsel/pols_regs/prr_guidelines.php)

# W3C Web Content Accessibility Guidelines (WCAG)

- WCAG 1.0 in 1999, WCAG 2.0 in 2008
- Level A - 26 success criteria
  - Alt text on images
  - Structural markup
  - Captions on video
- Level AA – 13 success criteria
  - Visible focus for keyboard users
- Level AAA – 23
  - Sign language on video
  - Easy-to-understand language

# Policy Analysis Questions

1. Who issued this policy?
2. What technology is covered?
3. How is “accessible” measured? What is the standard?
4. Is there a timeline?
5. What is the requirement for legacy web pages?
6. Who is responsible for what?
7. Who is responsible for covering the cost?
8. Where does one go for technical support?
9. Are there repercussions for non-compliance?
10. Is there a formal process for receiving an exemption?