



South Carolina

Digital Accessibility Road Map

October 2020

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executive summary

High-Level Findings and Recommendations

The Digital Accessibility Challenge

Continuously pursuing university-wide accessibility compliance is a necessary undertaking to avoid costly lawsuits and serve all UofSC community members excellently. It is also an undertaking that requires wrangling a deluge of sites, technology, content, and people.

UofSC needs a cogent, actionable plan that stands up to even the toughest scrutiny and positions the university as a digital accessibility leader.

High-Level Findings

Lawsuits against higher education institutions for accessibility non-compliance is on an upward swing.

If significant steps are not taken to ensure UofSC's digital accessibility, the question is not if the university will be sued, but when. In fact, the U.S. Office of Civil Rights has already filed one suit against the university that can be reopened at any time.

UofSC will not achieve accessibility compliance without a clear plan.

Current digital processes occur largely in a decentralized content model where sc.edu site content is generated in unit- and department-driven vacuums. As a result, faculty and staff often create or implement unsanctioned one-off sites and other digital properties hung off the main sc.edu root or otherwise strongly associated with the university.

In terms of digital accessibility, anything not owned by Communications and Digital Strategy is currently the Wild West.

There is no current role that can handle oversight of all digital accessibility efforts.

Rallying an entire university around digital accessibility and overseeing the effort is a huge job. No existing role will have the time or expertise needed to identify accessibility problems, recommend solutions and keep everyone on track for compliance.

The vast majority of those creating online content do not understand digital accessibility.

Those creating digital experiences at UofSC have had little or no accessibility training, either in how to make content accessible or why doing so is important. This lack of understanding causes them to see accessibility as a burden rather than as a worthy effort. It also causes them to make common accessibility mistakes: missing alt text, bad heading hierarchy, inaccessible documents, etc. Without a plan for ongoing education and particularly training, things will continue in this vein.

Lack of a public accessibility standard on the UofSC site makes it difficult to know how to comply.

There has not been a one-stop shop for all things accessibility on sc.edu. Community members have had no clear place to report problems. Faculty and staff have had no clear place to get help. No one has a clear idea what accessibility requirements should be for their work because they have not yet existed.

The issue extends to all technology used by the university.

All digital content and properties: software, third-party offerings, educational materials, social media posts, and public databases, digital signage, etc. must eventually be brought into line with digital accessibility compliance.

High-Level Recommendations

Roles & Responsibilities	Education	Policy & Procedures
<p>Hire a Director of Digital Accessibility. The sizeable effort involved in overseeing all digital accessibility undertakings at UofSC requires a new dedicated position, filled by an accessibility expert.</p> <p>✔ Complete</p> <p>Create an Accessibility Committee. Keep the committee small, including accessibility, communications and technology experts from across the university.</p> <p>✔ Complete</p> <p>Define clear accessibility roles. Everyone who touches the university's digital content and properties products (sites, apps, tools, social media, documents, etc.) should have a clearly defined role in the accessibility effort. It would be wise to incorporate accessibility language into these positions' job descriptions as well.</p> <p>✔ Complete</p>	<p>Educate faculty and staff about the real-world importance of accessibility. Build empathy with UofSC faculty and staff by helping them understand the difficulties people with disabilities face online every day. Also relay to them the very real legal risks associated with non-compliance.</p> <p>Train faculty and staff in best practices. Institute task- and role-specific training for everyone who touches digital properties at the university. Offer topic-based materials they can reference on their own as well.</p> <p>Set up incentives for those who get it right. Recognize those who practice good digital accessibility with tangible incentives. Identify those who consistently miss the mark and why, taking additional training or other education measure to help.</p>	<p>Write a comprehensive and enforceable accessibility policy. The policy should make clear that digital accessibility applies to all technology at the university, and that everyone who owns or manages that technology is responsible for accessibility.</p> <p>✔ Complete</p> <p>Write clear procedures to accompany the policy. Procedures may change over time, but should be documented and kept up to date to clearly communicate how the work gets done.</p> <p>✔ Complete</p> <p>Ensure policy and procedures are easy to read and understand. Avoid the temptation to use legalese to cover bases. Policy and procedures will be better understood and followed if real people can read and implement them.</p> <p>✔ Complete</p>

High-Level Recommendations / Continued

The University's Stance on Accessibility	Long-Term Plan	Leadership
<p>Create a prominent, public accessibility site as part of sc.edu. This site: 1) Shows the public that UofSC cares deeply about digital accessibility. 2) Serves as a one-stop shop for anyone needing accessibility guidance and assistance. This site should be highly visible.</p> <p>✔ Complete</p> <p>Offer practical help for accessibility best practices. Create real-world, role-based, topical and task-based help for creating accessible digital content.</p> <p>✔ Complete</p> <p>Allow for easy reporting of accessibility issues. Do not hide or minimize the ability to submit complaints about accessibility issues. Proactively make reporting a main action on the accessibility site.</p> <p>✔ Complete</p>	<p>Lay solid groundwork for an expansive accessibility plan. This Accessibility Road Map document is the beginning of a strong plan that will carry UofSC through accessibility efforts now and in the future. It will grow and change as the accessibility program does.</p> <p>✔ Complete</p> <p>Plan for the accessibility effort to evolve over time. Accessibility at UofSC is forever. As we move forward toward making all digital content accessible, different challenges and efforts will come more and less into focus.</p> <p>Reassess each year with a formal review of efforts and progress. Track what has been done and identify immediate next goals yearly. Document quantitative and qualitative progress in an official report that shows accessibility work across the university.</p>	<p>Be unflinchingly transparent. A successful effort means there should be no reason for UofSC to hide or minimize anything related to digital accessibility. Share progress and plans publicly.</p> <p>Create a culture of accessibility university-wide. Incorporate digital accessibility considerations in every technological decision, reiterating to staff at every turn why it's so imperative to serve those with disabilities just as well as those without.</p> <p>Become a vocal advocate for digital accessibility. Champion accessibility initiatives, programs, and other opportunities. Publicly recognize accessibility at UofSC as an inextricable part of providing the very best education and experience possible for all students.</p>

Digital Accessibility Leadership

Digital accessibility can no longer be ignored.

Accessibility has always been a noble undertaking worth aspiring to. Now, the threat of private and federal litigation forces the issue. UofSC must get on board.

Embrace accessibility to our very core.

It's not enough to go through the motions. For true success, we must adopt accessibility as part of every digital thing we do.

Become an example for other universities.

All colleges and universities are in the same boat, but many are floundering in the digital accessibility sea. Seize the opportunity to step up as a leader and champion for those with disabilities.

risks & consequences

The Cost of Digital Accessibility Non-Compliance

The Precedent Has Been Set

50+ higher education accessibility lawsuits filed in the final months of 2018 alone

10/7
2019

Robles v. Domino's

The Supreme Court upheld the Ninth Circuit Court of Appeals **decision** that organizations can be **sued** for **websites** and digital products that are **inaccessible** for those with disabilities.

Past Accessibility Settlements & Payouts *

\$150,000 in payouts & attorney fees

Florida State University, 2012

Source: Chronicle of Higher Education

\$250,000 in tuition costs for plaintiff + attorney fees

Miami University, 2016

Source: Miami University

\$820,000 in damages and attorney fees

California State University San Bernardino, 2007

Source: San Diego State University, Interwork Institute

\$8,730,000 in penalties, damages and attorney fees

Law School Admission Council

This was not a digital suit but did involve a higher education entity's accessibility barriers and their negative effects on students. Courts have ruled digital spaces must abide by the same rules.

Source: United States Department of Justice

* Figures only refer to direct legal costs. These numbers do not include remediation costs or internal time (one-time and recurring) spent on accessibility.

What Happens if Nothing is Done?

Private or class action lawsuits.

Many higher education institutions have been sued by individual plaintiffs or groups of plaintiffs (usually students). These universities have either agreed to make the same investment in digital accessibility as the one outlined in this Accessibility Road Map or have paid dearly to fight their case in court, most often to a losing verdict.

The U.S. Office of Civil Rights (OCR) reopens their case.

The OCR case against the University of South Carolina is currently closed, but only under the condition that the university's digital properties continue to improve in accessibility compliance. Without a plan in place like the one outlined in this Accessibility Road Map, accessibility efforts will eventually slow and drag, leaving the university open to OCR's scrutiny and costly remediation once again.

Pay hundreds of thousands of dollars (or more) in legal fees.

Even if a case is decided in the university's favor against a private or class action plaintiff (unlikely) or against OCR (very, very unlikely), attorney fees for just one suit could equal or exceed the cost of going through this effort. If the case is not decided in our favor (a high probability), the university could pay huge sums in settlement, payouts and even damages for every open case. These fees will multiply many times over the initial cost of doing accessibility right in the first place.

Potentially lose academic funding.

A judgment against the university in a U.S. Office of Civil Rights case can result in loss of federal research, grant and scholarship funding.

End up putting this plan into action anyway.

Almost every higher education accessibility case ends in not only costly fees and settlements, but in the requirement to make a plan for remediation and better accessibility going forward. In short, after all the headache and expenses, we'll end up coming back to this plan and implementing it on top of everything else.

Fail to live up to our commitment to an inclusive campus for all.

Inclusivity is one of the main tenets of our university. We cannot claim to be inclusive if we have not invested in an accessible, inclusive digital campus.

glossary

Here, we define what the words we use mean in terms of the UofSC accessibility effort.

Key Accessibility Initiative Terms

Assistive Technology

Tools that help people with disabilities navigate and interact with digital products and digital content. These technologies include but are not limited to screen readers, keyboards, speech-to-text software, eye and head control technology, switches, and prosthetics.

Digital Accessibility

The ability of digital products (websites, applications, software, systems, social media and related digital content and services) to be accessed easily and efficiently by all users, including people with disabilities.

Digital Content

Any material — text, image, video, audio, document, or otherwise — used for an interactive context, whether or not it was originally intended for that purpose.

Digital Products

Any piece of technology that people to interact with: websites, applications, software, intranets, systems, wearables, etc.

Disability

A permanent, temporary, or situational condition that affects a person's physical and/or cognitive ability to use one or more of the sense, and/or limits motion and/or impacts regular activities.

Screen Reader

Software that reads screen-based interactive content aloud, helping people with disabilities (e.g., visual impairment, physical or learning disorders) access and use digital products.

Section 508

A federal law mandating that all of the federal government's digital products and technology must be accessible for those with disabilities. Section 508 is an amendment to the United States Workforce Rehabilitation Act of 1973.

Siteimprove

An online software service that regularly scans the UofSC website for accessibility issues and provides a report of compliance problems and where they occur.

UofSC Sites or Digital Products

Any website, web application, or digital functionality housed within the University of South Carolina (sc.edu) domain.

Users

Anyone who needs to interact with the UofSC website or any digital products provided by UofSC. This list could include current and future UofSC students, UofSC faculty and staff, parents of UofSC students, community members, people at other universities, and accessibility compliance officers.

Usability

The level of ease with which a person, with or without disability, can engage with a particular website, application, or other digital product.

Key Accessibility Initiative Terms (continued)

VPAT (Voluntary Product Accessibility Template)

A document or web page, provided by the creator of a digital product or service, that outlines exactly how their offering is in compliance with Section 508 as well as any ways it is not in compliance with that standard. This is the widely accepted method for companies creating web and digital products to prove compliance with Section 508.

WCAG

Web Content Accessibility Guidelines (WCAG) are part of a series of web accessibility guidelines published by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C). WCAG has three levels but WCAG Level AA is the typical standard for websites, applications, software, and other digital products. WCAG Level AA is the standard we are referencing throughout this document.

goals & objectives

Here we define goals, how to achieve them, and how we'll measure success.

Goals

Define	Achieve	Measure
<p>1 Continuously strive for accessibility compliance.</p>	<p>Implement and enforce a detailed policy and procedures. Leave no question as to what should be done and by whom in which situation. Evolve policies and procedures over time as needs and issues change.</p> <p>Hire a Director of Digital Accessibility. This person champions accessibility at the university and helps everyone creating digital content and products to stay on track.</p> <p>Perform regular reviews of digital properties. Prioritize digital properties by those with the highest traffic and most mission-critical purpose, then move from least recently reviewed first back around to the beginning of the priority list. Use a constantly updated Master List of all digital properties to guide accessibility review order.</p> <p>Offer practical guidance. Accessibility standards can be a lot to remember. Provide guides and step-by-step instructions.</p> <p>Create checks for new digital undertakings. Accessibility reviews and fixes should be part of every new digital property, whether developed in-house, purchased or implemented for free.</p>	<ul style="list-style-type: none"> › Reduced issues listed in Siteimprove. › Drastically reduced or no digital properties purchased or implemented with an official accessibility review. › Fewer complaints made about accessibility issues. › The Office of Civil Rights keeps the university's file closed, for good. › The Accessibility Committee members have the ability to focus on long-term goals and new initiatives, not daily triage.

Goals

Define	Achieve	Measure
<p>2 Foster an inclusive culture and understanding of accessibility within the university.</p>	<p>Make accessibility a priority. Focus on the impact of accessibility on the lives of real people and students to build empathy and understanding among university staff. Communicate also the very real risks of not complying with accessibility guidelines.</p> <p>Educate faculty and staff. Train anyone who touches digital content or properties in how to make their daily work accessible. Provide comprehensive and topical reference materials for those working on their own. Offer presentations and meetings to answer questions and hear out concerns.</p> <p>Incentivize those doing it well. Reward those succeeding at accessibility with tangible incentives and make them part of larger education and improvement initiatives.</p>	<ul style="list-style-type: none"> › Fewer issues found in regular and requested accessibility reviews. › Fewer reported accessibility complaints. › Increased understanding of the needs of students with disabilities. › Greater staff and faculty buy in to accessibility initiatives—fewer concerns and questions. › More accessibility champions at the unit level. › Ability to create new initiatives to improve accessibility over time.

Goals

Define	Achieve	Measure
<p>3 Practice transparency and show goodwill in connecting with the community.</p>	<p>Give the larger UofSC community an easy way to report an accessibility issue. The university’s accessibility site should feature a prominent way for anyone to report accessibility problems.</p> <p>Make the accessibility section incredibly easy to find from the home page. Ensure staff, students and other members of the larger university community can find this information easily.</p> <p>Set a standard for responding to complaints. Accessibility complaints are frustrating for the university. Accessibility barriers are frustrating for users. Define a procedure for responding that is polite, timely and makes the process less painful for everyone.</p> <p>Show the university’s accessibility progress. Be perfectly open about where we’ve been, where we are and where we’re planning to go next.</p>	<ul style="list-style-type: none"> › Timely complaint resolution. › Reduced risk of complaint escalation. › Few questions regarding how to report an issue or the process for reporting. › Increased recognition as UofSC as a leader for accessible practices in the community.

Goals

	Define	Achieve	Measure
<p>4 Become an example for other universities.</p>	<p>Create a user-friendly, comprehensive online accessibility section. Be plain-spoken, organize content for regular people, offer practical guidance and address the hard accessibility challenges.</p> <p>Allow for growth and change over time. Architect a strong, unchanging, underlying section structure that can flexibly handle expansion.</p> <p>Show a clear plan forward with timeline and milestones. Show real progress and the ideal state for the future. Where are you now, where have you been, and where are you heading?</p> <p>Record success. Define metrics and measure progress at regular intervals. Improve where needed. Document and expand on successes.</p>	<ul style="list-style-type: none"> › Significant accessibility section traffic from other universities. › Digital departments at other universities ask for help. 	

research data

We've looked deeply into identifying the digital accessibility issues impacting digital content and properties owned by sc.edu.

Methods

Siteimprove Reports

We reviewed Siteimprove reports to identify the biggest accessibility problem areas across sc.edu.

- › Most Common Issues
- › Units, Colleges & Divisions With the Most Issues

Accessibility Testing

We have used assistive technology to extensively test the sc.edu site and third-party products (with the exception areas that require a login).

- › Screen Reader Testing (NVDA)
- › Keyboard Testing

Expert Accessibility Review

We conducted an expert review of the sc.edu site and third-party products, reviewing according to WCAG AA guidelines and accessibility best practices. We focused particularly on:

- › Content
- › Documents
- › Media
- › Development
- › Design

Complaints Received

Reports of inaccessible content and properties come in from individuals, usually beginning with an issue raised by a student to the Student Disability Resource Center.

Team Discussions

We have discussed accessibility issues and needs at length with the Accessibility Committee members including:

- › CIO and Supporting Executives
- › Student Disability Resource Center Representatives
- › Communications Representatives, including from Digital Strategy

Open Forums & Individual Questions

The Digital Accessibility Team hosted six open forums during summer 2020 to gather questions and concerns from faculty and staff across the university.

Members of the Committee also report individual questions and concerns raised by faculty and staff.

High-Level Findings

Theme/Issue	Recommendations
<p data-bbox="235 480 743 651">Most barriers to accessibility have been corrected.</p> <p data-bbox="235 732 711 821">Shown By: OCR Review, Siteimprove Reports and Expert Review</p>	<p data-bbox="856 475 1052 505">Keep it going!</p> <p data-bbox="856 513 1944 618">Communicate the priority of accessibility through official policies, procedures, oversight of the accessibility committee and establishment of a director-level position overseeing digital accessibility.</p> <p data-bbox="856 667 1860 696">Continue to govern the main template so it's difficult to make mistakes.</p> <p data-bbox="856 704 1906 812">OU Campus reduces Content Creators' and Site Managers' mistakes by constraining what they can edit. Continue to move sites into the CMS and ensure template changes are reviewed before going into production.</p>
<p data-bbox="235 922 669 1092">Ongoing problems are often caused by Content Creators.</p> <p data-bbox="235 1174 678 1263">Shown By: Siteimprove Reports, Expert Review, Team Discussions</p>	<p data-bbox="856 917 1346 946">Keep an eye on key problem areas.</p> <p data-bbox="856 954 1948 1024">Typical issues are often easily corrected if these Content Creators have the appropriate help material and training.</p> <p data-bbox="856 1068 1919 1097">Adopt a workflow that prevents inaccessible content from being published.</p> <p data-bbox="856 1105 1927 1175">All major digital undertakings should be reviewed by the Director of Digital Accessibility and Site Managers should check Content Creators' work for accessibility.</p> <p data-bbox="856 1219 1703 1248">Crack down on sites created outside of the OU Campus CMS.</p> <p data-bbox="856 1256 1929 1326">Restrict access to the root domain to prevent the creation of sc.edu sites that haven't been reviewed by the Director of Digital Accessibility.</p> <p data-bbox="856 1370 1604 1399">Provide easy access to accessibility training materials</p> <p data-bbox="856 1408 1944 1477">Create a hub where Content Creators can quickly get to guides for creating accessible content, including answers to trickier questions.</p>

High-Level Findings

Theme/Issue	Recommendations
<p data-bbox="235 431 730 669">Most critical problems are often caused by digital platform business owners.</p> <p data-bbox="235 748 688 837">Shown By: Complaints Received, Expert Review, Team Discussions</p>	<p data-bbox="856 427 1717 456">Put accessibility checks in place for the procurement process.</p> <p data-bbox="856 464 1944 534">No digital contracts can be renewed or approved if the site, app, tool or platform does not comply with digital accessibility guidelines.</p> <p data-bbox="856 578 1934 649">Require business owners to inform the Director of Digital Accessibility about new digital initiatives.</p> <p data-bbox="856 657 1751 686">All new digital properties should be added to the director’s Master List.</p> <p data-bbox="856 730 1724 760">Review all new digital properties for accessibility compliance.</p> <p data-bbox="856 768 1944 837">The Director of Digital Accessibility should review all new digital properties before and after launch.</p> <p data-bbox="856 881 1856 911">Empower accessibility liaisons to keep an eye on new digital initiatives.</p> <p data-bbox="856 919 1906 989">Liaisons should perform high-level accessibility reviews of any new digital property they become aware of and ensure that the director has been informed.</p>

High-Level Findings

Theme/Issue	Recommendations
<p data-bbox="235 418 747 597">Some faculty members are hesitant to update their course materials.</p> <p data-bbox="235 672 753 797">Shown By: Open Forums, Team Discussions, Questions Received by Director, Small Group Meetings with Faculty</p>	<p data-bbox="856 415 1955 488">Give instructors the fastest or most efficient ways to digital accessibility. When possible, include a quick solution or the easiest route in help and guide content.</p> <p data-bbox="856 529 1892 678">Educate faculty about the importance of accessibility in their classrooms. Make it part of all communications to faculty that a more accessible classroom provides a higher quality education and keeps the university in good standing for federal grant, research and scholarship funding.</p> <p data-bbox="856 719 1892 829">Phase in course material requirements. Asking faculty members to make all materials accessible at once is overwhelming. Start with all new course content and work to add requirements from there.</p>

High-Level Findings

Theme/Issue	Recommendations
<p data-bbox="235 480 737 716">People updating sites and creating content still do not understand the basics.</p> <p data-bbox="235 797 678 886">Shown By: Siteimprove Reports, Expert Review, Team Discussions</p>	<p data-bbox="856 475 1115 505">Train and educate.</p> <p data-bbox="856 513 1927 621">Require training for new faculty and staff who create or manage site content. Provide regular educational opportunities to improve staff’s understanding of disabilities and the impact of accessibility decisions on the community.</p> <p data-bbox="856 667 1289 696">Seek out those who are failing.</p> <p data-bbox="856 704 1892 813">Track site issues through regular reviews and find the sites who are falling behind. Meet with those involved to find the root of the problem. Recommend those who regularly fail standards for additional in-person training, if necessary.</p> <p data-bbox="856 859 1209 888">Incentivize doing it right.</p> <p data-bbox="856 896 1940 1005">Highlight those doing it right as role models and encourage them to work with other groups who need more support. Consider a tangible incentive to do accessibility well, perhaps in the form of awards for units and individuals.</p>
<p data-bbox="235 1094 737 1273">Those who are actively trying to comply need more support.</p> <p data-bbox="235 1349 422 1406">Shown By: Team Discussions</p>	<p data-bbox="856 1089 1535 1118">Delegate responsibility to better ensure success.</p> <p data-bbox="856 1127 1881 1235">This isn’t a job for just one person. Accessibility (education, recognizing and fixing issues, and enforce policies) is a lot of work for often already-overworked people. Delegate work through clear delineation of roles and responsibilities.</p> <p data-bbox="856 1281 1688 1310">Harness the brain power of those who have the knowledge.</p> <p data-bbox="856 1318 1940 1427">Seek out faculty and staff who have a passion for accessibility and the know how. Encourage them to take leadership roles, perhaps by supporting Site Managers and Content Creators, giving presentations, or being a part of other accessibility initiatives.</p>

High-Level Findings

Theme/Issue	Recommendations
<p data-bbox="235 479 730 722">Many are unsure of what accessibility measures are required by when.</p> <p data-bbox="235 795 703 885">Shown By: Team Discussions, Open Forums, Questions Received by Director, Small Group Meetings</p>	<p data-bbox="856 470 1753 511">Post current efforts and requirements online. Update regularly.</p> <p data-bbox="856 511 1942 625">Use the accessibility site as the place to keep the university community informed as to what progress is currently being made and what that means for their role in terms of digital accessibility requirements.</p> <p data-bbox="856 657 1501 698">Clearly communicate phases of requirements.</p> <p data-bbox="856 698 1942 812">This undertaking is too large to require total accessibility compliance across all digital roles immediately. Some more time-consuming tasks or accessibility for older content may be phased in—be clear about what these are when they will be required.</p> <p data-bbox="856 852 1879 893">Encourage people to start all practices early, regardless of requirements.</p> <p data-bbox="856 893 1900 1006">Even though enforcement of certain requirements might be phased in more slowly than others, strongly encourage everyone to begin all accessibility practices immediately in preparation for them to be required.</p>
<p data-bbox="235 1096 682 1274">Some are asking: “Will this actually be enforced?”</p> <p data-bbox="235 1347 724 1437">Shown By: Team Discussions, Open Forums, Small Group Meetings</p>	<p data-bbox="856 1088 1753 1128">Clearly state the leadership and official policy behind the effort.</p> <p data-bbox="856 1128 1921 1242">This is the first time an accessibility effort of this size has been instated as an official program at the university. In all communications, emphasize the commitment the university is making to digital accessibility through the policy and this strategic plan.</p> <p data-bbox="856 1282 1596 1323">Ensure everyone knows the risks of non-compliance.</p> <p data-bbox="856 1323 1932 1437">Reiterate whenever appropriate that while digital accessibility is the right thing to do, it’s also a serious legal risk to the university and its academic funding. Enforcement is key to ensure the university stays out of legal hot water.</p>

High-Level Findings

Theme/Issue	Recommendations
<p data-bbox="233 480 758 721">The university does not have a role dedicated to digital accessibility oversight.</p> <p data-bbox="233 797 426 854">Shown By: Team Discussions</p>	<p data-bbox="856 475 1751 506">Create a role that is solely dedicated to overseeing accessibility.</p> <p data-bbox="856 513 1843 581">Hire a Director of Digital Accessibility to lead accessibility efforts campus wide, monitor, advance and report on these efforts as they progress.</p> <p data-bbox="856 626 1766 657">Someone must be able to interpret issues and provide solutions.</p> <p data-bbox="856 664 1938 732">It's one thing to know what the issue is. It's another to provide the correct method for fixing it to the person who can execute the fix.</p> <p data-bbox="856 777 1692 808">This role should hold the rest of the university accountable.</p> <p data-bbox="856 815 1938 883">Someone needs to keep an eye on things and make sure policies and procedures are enforced correctly.</p>

Most Common OU Campus Content Issues

Results obtained from Siteimprove review (10/04/2020).

Problem	Example	Solution
<p>Redundant and Vague Link Text Vague and often identical link text is used for multiple different destinations.</p>	<p>“Read More” Using “Read More” for multiple links on a page.</p>	<p>Provide Descriptive Links Each link should be descriptive, concise, and clearly indicate where it will take the user.</p>
<p>Empty Headings Empty lines use the heading style, but do not contain text, which confuses those using screen readers when navigating a page.</p>	<p>Use of Empty Headings for Space Use of an empty heading to provide extra space between sections in body content.</p>	<p>Use Tools Provided by CMS OU Campus site editors should toggle on show blocks and check that their empty lines are not headings. Ideally, extra space would be built into CMS styles and not needed to be added manually.</p>

* **Significant Progress:** SiteImprove reports for sites built and managed in the OU Campus CMS show significant improvement in addressing common accessibility issues, leaving the two areas above as the only two that remain common enough to note.

Most Problematic Digital Content Issues

Results obtained from expert accessibility review.

Problem	Example	Solution
<p>Inappropriate Headings Non-semantic heading hierarchy is common.</p>	<p>Selection of Headings for Appearance</p> <ul style="list-style-type: none"> › Use of bold text for headings instead of the proper H tag. › Choosing headings for the way they look instead of semantically. 	<p>Use the Correct Headings</p> <ul style="list-style-type: none"> › Use an H tag for all headings. Bolded text is not seen by screen readers. › Use headings in order rather than picking one because it “looks” best.
<p>Inaccessible Documents Many documents, especially PDFs, do not comply with accessibility standards.</p>	<p>PDFs Without Tags</p> <ul style="list-style-type: none"> › Screen reader users rely on tags within a PDF to communicate content hierarchy, context and function. 	<p>Remediate Document and Provide Training Fix documents flagged in Siteimprove and make sure those making documents get proper training.</p>
<p>Useless Alt Text Alt text often doesn’t actually provide a description of an image.</p>	<p>Alt Text Present but Not Accurate</p> <ul style="list-style-type: none"> › Alt text says “image” or uses the image’s file name. 	<p>Author Alt Text Thoughtfully Alt text should be descriptive and helpful, conveying visual information certain users can’t access otherwise.</p>

roles & responsibilities

What individuals and groups are responsible for digital product accessibility at UofSC?

Roles / At-a-Glance

These are the primary digital product accessibility roles at UofSC. Others also participate in the process, some of whom are identified in this document.

Chief Information Officer

Final responsibility for digital accessibility compliance at UofSC.

“I must respond quickly and confidently if the university receives an accessibility complaint.”

Director of Digital Accessibility

Leads all accessibility efforts and serves as point of contact for Accessibility Committee.

“I champion accessibility for everything digital and help all units do the same.”

Digital Accessibility Committee

Discusses high-level strategies and ensures UofSC is on track for digital accessibility compliance.

“We strategically plan digital accessibility efforts and keep the university on track.”

Digital Strategy Reps

Participates as part of the Committee and oversees new major digital initiatives.

“We ensure all new digital projects include a plan for accessibility compliance.”

Student Disability Resource Center Reps

Serves on the Committee and guides accessibility related to educational efforts.

“The students are the center of our focus for creating a more inclusive digital campus.”

Accessibility Liaisons

Oversee technology initiatives for a department, college, or division.

“We make sure all digital initiatives in my college or division follow accessibility guidelines.”

Faculty & Instructors

Provide accessible educational materials to students.

“All course content and materials must comply with accessibility guidelines.”

Deans & Chairs

Final responsibility for digital accessibility in their unit.

“I help ensure all digital work in my unit is accessible, enforcing policy and addressing issues as needed.”

Roles / At-a-Glance (continued)

Digital Platform

Business Owners

Build or implements new digital products, tools or services that comply with accessibility standards.

“All digital properties our units purchase or implement are accessible.”

Site Managers

Responsible for approving content uploaded to unit websites.

“I have the final word as to what goes on the site , and everything I publish must be accessible.”

Content Creators

Make content changes and updates to the unit site or creates materials that go on the site.

“I create communications materials and may know a lot or nothing about the web.”

Division of IT

Develops new content and properties with accessibility in mind.

“I make sure all of our digital properties are built to comply with accessibility standards.”

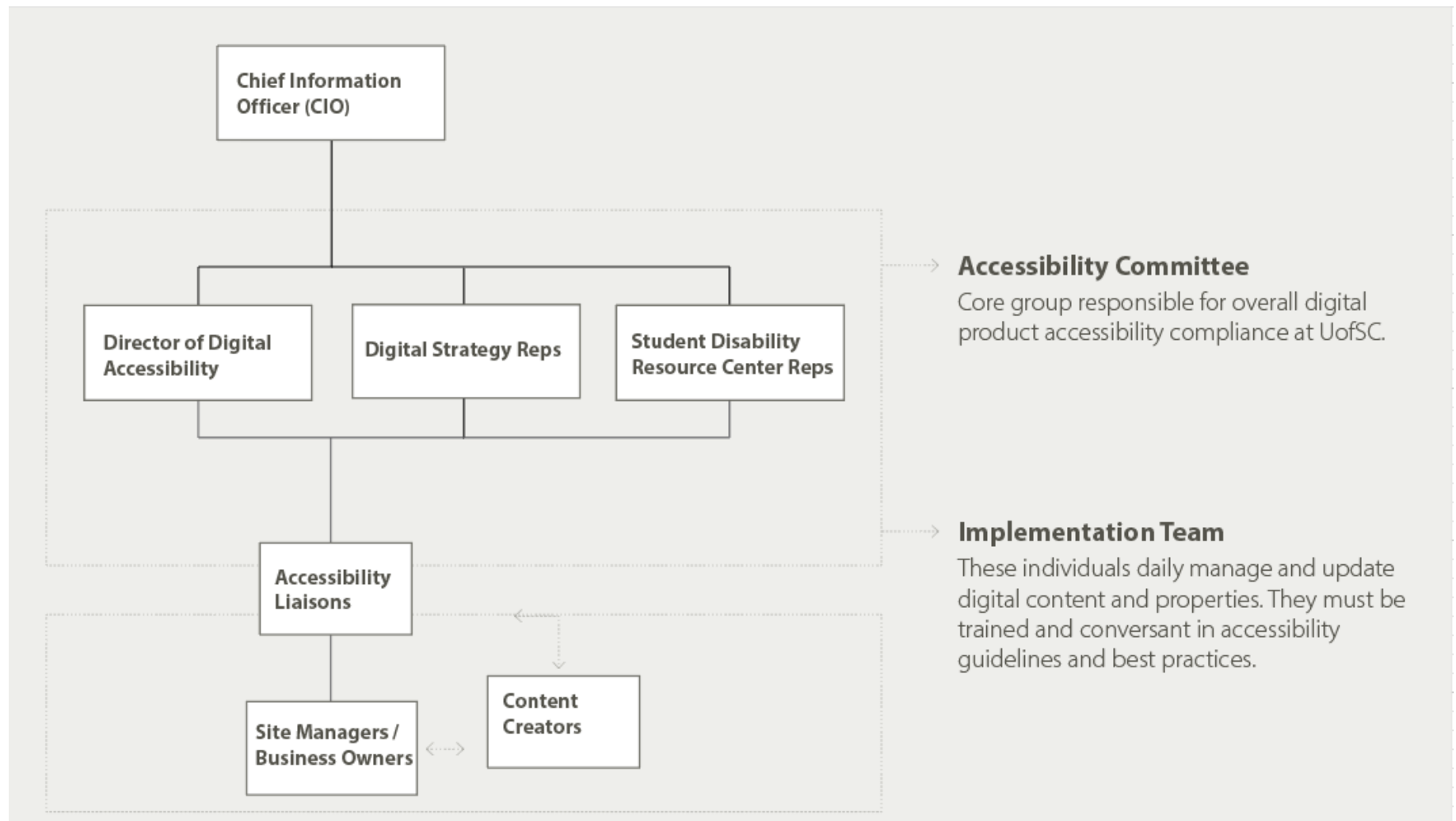
Procurement

Reviews new digital contracts to ensure accessibility compliance.

“I vet new digital properties and follow up on compliance fixes before finalizing contracts.”

Accessibility Hierarchy

How specific roles relate to each other strictly from an accessibility perspective. *



* Actual University hierarchical structure may vary (e.g., the Office of Digital Strategy reports to Communications and Public Affairs).

CIO / The Driving Force

Final responsibility for digital product accessibility compliance at UofSC.

“I must respond quickly and confidently if the university receives an accessibility complaint.”

Responsibilities

- › **Advise the Accessibility Committee** – The CIO or executives appointed by the CIO participate in Accessibility Committee meetings and activities. Represents the strategic interests of the University to the committee.
- › **Report to Leadership and Interested Parties** – Report to the University Vice President and leadership stakeholders as to accessibility progress.
- › **Leadership and Delegation** – Directly oversee the Director of Digital Accessibility.
- › **Push Through Issues** – Help the Director of Digital Accessibility take action when a Site Manager or Accessibility Liaison is failing to meet standards.
- › **Engender an Accessibility Culture at UofSC** – Imbue teams, committees and staff with a desire to serve all users well and consider accessibility at every turn.
- › **Address Any Legal Conversations** – Handle communications and resolution between the legal entities (internal or external) and the Digital Accessibility Team, when and if the need arises.
- › **Communicate with University Leaders** – Help educate those in leadership positions at the university regarding the importance of digital accessibility and what help is needed from their college, division or office.

Director of Digital Accessibility / Leads the Committee

New Hire

Leads all accessibility efforts and serves as point of contact for Accessibility Committee.

“I champion accessibility for everything digital and help all units do the same.”

Responsibilities

- › **Continually Reviewing Digital Properties** – Perform or oversee regular accessibility reviews. Report issues to Site Managers or Product Owners to be corrected.
- › **Own the Master List** – Own and maintain the master list of digital properties at the university. Manage prioritization and issue ranking in the list.
- › **Define and Lead Training Efforts** – Define and manage required accessibility trainings for multiple types of content managers and creators, updating training curricula when needed and offering additional trainings as requested or required.
- › **Lead the Accessibility Committee** – Organize and head up meetings, delegating tasks to those inside and outside the committee.
- › **Attack Accessibility Issues** – Become the point person for ensuring the university stays on track toward accessibility goals.
- › **Work with Procurement** – Coordinate with procurement to set review, testing and vetting standards for third-party products.
- › **Liaise with Division of IT** – Work with Division of IT to ensure their work meets accessibility standards and to implement training for their teams.
- › **Report to the CIO and University** – Report regularly to the CIO and provide the Accessibility Committee with the monthly agenda to include: reviewed sites, initiatives under way, issues to be resolved and any other important items for discussion.
- › **Advocate for Accessibility** – Suggest and oversee new initiatives and projects to help continually improve accessibility at UofSC.
- › **Document Progress** – Outline progress and success measures for the effort, documented for all members of the university community to see the success milestones and timeline for the digital accessibility program as a whole.

Director of Digital Accessibility / Leads the Committee (continued)

New Hire

Leads all digital product accessibility efforts and oversees Accessibility Liaisons.

“I champion accessibility for everything digital and help all units do the same.”

Responsibilities

- › **Respond to Questions and Complaints** – Review reported issues and questions as they come in, delegating to accessibility liaisons or helping to resolve more complicated issues directly.
- › **Educate** – Define and carry out ways to keep digital accessibility at the forefront of digital efforts and teach those working with digital properties better and better digital accessibility practices.

Digital Accessibility Committee / The Collection of Expertise

Discusses high-level strategies and ensures UofSC is on track for digital accessibility compliance.

“We strategically plan digital accessibility efforts and keep the university on track.”

Members

Chief Information Officer

Participates in meetings, represents UofSC strategy and directs resources as needed.

Director of Digital Accessibility

Leader of the Committee. Heads up meetings, delegates tasks and follows up on items to be resolved.

Digital Strategy Representatives

Participate in meetings and own actions related to Digital Strategy's work: new university digital initiatives, content created by Communications & Public Affairs, overseeing university websites, etc.

Student Disability Resource Center Representative

Participate in meetings as the voice of the SDRC and student accessibility needs in a digital campus.

Responsibilities

- › **Achieve Accessibility Goals** – Ensure all digital products meet UofSC's goals and standards for compliance.

Responsibilities

- › **Achieve Accessibility Goals** – Ensure all digital products meet UofSC's goals and standards for compliance.
- › **Advocate for Accessibility** – Foster an inclusive culture and promote accessibility awareness throughout the university.
- › **Educate** – Organize regular educational opportunities.
- › **Meet Regularly** – Meet monthly to review progress and issues.
- › **Enact and Enforce Policies & Procedures** – Author, maintain and oversee accessibility policies and procedures.
- › **Report on Progress** – Document progress, new initiatives, issues and other pertinent items to the appropriate parties (Accessibility Liaisons, University Vice President, Division of IT, etc).
- › **Oversee Implementation** – Direct and delegate efforts for enacting strategic accessibility plan and remediating all accessibility issues.
- › **Manage Issues** – Strategize response to issues as they arise.
- › **Make Progress Toward Accessibility Goals** – Ensure digital products at the university are making progress toward larger accessibility goals and the standards for compliance.

Digital Strategy Reps / Keeps Digital Initiatives in Line

Participates as part of the Committee and oversees new major digital initiatives.

“We ensure all new digital projects include a plan for accessibility compliance.”

Responsibilities

- › **Make Accessibility Part of the Digital Process** – Update and maintain procedures for new university-wide digital projects to include a plan for accessibility compliance.
- › **Create and Enforce Accessibility Testing Checkpoints** – Ensure team tests each new digital strategy initiatives (new home page design, special landing page, virtual tour, etc.) for accessibility compliance before and after launch.
- › **Keep an Accessibility-Focused Developer on Staff** – The Digital Strategy team must include at least one developer who understands digital accessibility.
- › **Contribute to the Accessibility Committee** – Help resolve any issues that come up in accessibility reviews performed by the Director of Digital Accessibility.
- › **Keep the Director and Committee Information** – Update the Director of Digital Accessibility and the larger Accessibility Committee with a monthly status on upcoming new initiatives of note, accessibility issues, etc.
- › **Work with the Director of Digital Accessibility** – Collaborate and coordinate with the Director of Digital Accessibility for large digital initiatives that might require special compliance attention.
- › **Stay Abreast of Accessibility Changes and Tools** – Ensure team members understand accessibility and how to achieve it. Work to keep track of changes in accessibility compliance requirements, assistive technology and accessibility tools (testing, development, scanning, etc).

Student Disability Resource Center Reps / The Direct Link to Students' Needs

Serves on the Committee and guides accessibility related to educational efforts.

“The students are the center of our focus for creating a more inclusive digital campus.”

Responsibilities

- › **Contribute to the Accessibility Committee** – Help bring any issues to the attention of the larger Committee and complete tasks delegated by the Director of Digital Accessibility.
- › **Work with the Director of Digital Accessibility** – Collaborate and coordinate with the Director of Digital Accessibility for large digital initiatives that might require special compliance attention.
- › **Report Firsthand Complaints to the Digital Accessibility Team** – Make the full Committee aware of any complaints regarding digital accessibility or potential problems that arise during the course of everyday work.
- › **Delegate Digital Accessibility Work** – Send complaints that fall under the digital accessibility effort to the Director of Digital Accessibility, offering assistance and follow up as necessary.
- › **Take on Complaints Outside of Digital Accessibility** – Help to research and resolve complaints or issues that relate to accessibility, but outside of a digital context.
- › **Serve as Subject Matter Experts** – Review new content, educational materials, trainings, messaging, etc. to ensure the information communicated about digital accessibility is accurate and thorough.
- › **Offer Assistance Where Possible** – Step in to help answer questions and resolve issues for those who are struggling with digital accessibility compliance.
- › **Stay Abreast of Accessibility Changes and Tools** – Ensure team members understand accessibility and how to achieve it. Work to keep track of changes in accessibility compliance requirements, assistive technology and accessibility tools (testing, development, scanning, etc).

Accessibility Liaisons / An Invaluable Part of the Support Structure

Oversees technology initiatives for a department, college, or division.

“We make sure all digital initiatives in my college or division follow accessibility guidelines.”

Responsibilities

- › **Help Site Managers, Content Creators and Those Working with Digital Content** – Respond to questions and investigate more complex issues for those creating, managing, editing or otherwise working with digital properties in the liaison’s assigned college or division.
- › **Communicate** – Serve as a vital communication link between the Director of Digital Accessibility, the Accessibility Committee, Digital Strategy and those working with digital content and properties within the liaison’s assigned college or division.
- › **Become Accessibility Conversant** – Complete accessibility training and stay up to date on new accessibility developments.
- › **Assume the Voice of Accessibility in the College or Division** – Ensure each new digital initiative that the liaison becomes aware of within the assigned college or division complies with accessibility guidelines.
- › **Keep Track of Issue Resolution** – Be aware of progress toward accessibility remediation and compliance in the college or division. Document individuals or units who have the most problems and recommend them for further training, if needed.
- › **Check Each New Project for Compliance and Alert Director** – Ensure the Director of Digital Accessibility is aware of new digital initiatives that come up within the college or division. Conduct a preliminary review for accessibility and endeavor to fix issues found before the Director of Digital Accessibility’s official review.

Note: Initially, this should be a volunteer position. If someone in the college or division has a special interest in or knowledge of accessibility, they can take on this role. After volunteers are in place, college deans and division chairs will need to appoint a liaison if they do not yet have someone identified. In some cases, the Accessibility Liaison may also be the Communications Manager or (for smaller units) may also be the Site Manager.

Faculty & Instructors / Creating an Inclusive, Accessible Classroom

Provide accessible educational materials to students.

“All course content and materials must comply with accessibility guidelines.”

Responsibilities

- › **Create Accessible Course Materials** – All course content, whether distributed via Blackboard, online classroom platforms, email or any other way, should comply with digital accessibility guidelines.
- › **Make Accessibility Part of Daily Work** – All content that could possibly be shared in a digital context (which will be most content) should be created according to accessibility standards from the outset.
- › **Respond to Requests from the Digital Accessibility Team** – Make any requested changes regarding accessibility of content that will go online or in any digital product.
- › **Train in Accessibility Compliance** – Attend training for making daily course content accessible and become well-versed in digital accessibility standards.
- › **Respond to Accessibility Reviews** – Fix accessibility issues raised in regular reviews of the university’s digital content.
- › **Ensure Documents and Media Are Accessible** – Check each new PDF, Word document and other files along with any videos or audio for compliance with digital accessibility standards before sharing online.
- › **Teach the Next Generation** – Whenever possible, instructors should incorporate accessibility standards into their requirements for projects created by students to be shared in a digital context.

Deans & Chairs / The Enforcers for Their Units

Final responsibility for digital accessibility in their unit.

“I help ensure all digital work in my unit is accessible, enforcing policy and addressing issues as needed.”

Responsibilities

- › **Champion Accessibility Within the Unit** – Be a voice for the importance of digital accessibility and implementing accessibility practices into everyday work.
- › **Set an Expectation for Digital Accessibility Compliance** – Make it clear that all digital content and properties are expected to comply with accepted digital accessibility guidelines.
- › **Handle Escalation of Non-Compliance Issues** – Resolve issues where unit personnel are not complying with digital accessibility standards and oversee remediation of any existing inaccessible digital content.
- › **Ensure New Digital Properties Pass Accessibility Checks** – Confirm that new or renewed digital properties (whether purchased, developed in-house or implemented for free) conform to digital accessibility checks put in place by Procurement and the Technical Review Board. Confirm as well that the Director of Digital Accessibility is aware of all digital properties used by the unit.
- › **Appoint or Approve Accessibility Liaisons** – Support the digital accessibility effort by helping to ensure at least one digital accessibility liaison is always in place in the larger unit or division.

Digital Platform Business Owners / The Key to Accessible Third-Party Digital Properties

Build or implements new digital products, tools or services that comply with accessibility standards.

“I make sure all digital properties my unit purchases or implements follow accessibility guidelines.”

Responsibilities

- › **Keep Accessibility in Mind** – These business owners may not be the ones who ultimately buy, implement or build the product, but their plan for the new digital effort must include ensuring that the end result is accessible.
- › **Ensure Third-Party Products Are Accessible** – Any third-party digital offering must comply with all WCAG Level AA standards. Business owners must make this part of their plan from the beginning of any new digital initiative involving third-parties.
- › **Work with Procurement** – Digital properties requiring a university contract will go through accessibility checks and review during the procurement process.
- › **Work with Division of IT** – Any new digital undertaking built internally must comply with all WCAG Level AA standards. Business owners must work with in-house developers and the Director of Digital Accessibility to ensure their new platform or property is reviewed and approved for accessibility before launch.
- › **Oversee Requested Accessibility Fixes** – If accessibility issues are found in the new digital property at any time, the business owner is responsible for follow up to ensure those issues are corrected and for communication with the Director of Digital Accessibility regarding resolution of the issues.

Site Managers / Day-to-Day Accessibility Gatekeeper

Responsible for approving content uploaded to unit websites.

“I have the final word as to what goes on the site, and everything I publish must be accessible.”

Responsibilities

- › **Work With the Accessibility Liaison** – Form a back and forth relationship with the college or division’s liaison.
- › **Review Changes from Content Creators** – Oversee changes, ensuring Content Creators don’t publish anything that is non-compliant. A workflow in the OU Campus CMS that requires changes to be submitted for approval may be warranted.
- › **Become Highly Conversant in Digital Accessibility** – Master accessibility compliance via training.
- › **Respond to Site Reviews** – Fix issues that come up in the Digital Accessibility Director’s reviews of their site. Fix those items or other issues the Accessibility Liaison brings to their attention.
- › **Communicate Vigorously** – Alert Digital Strategy and/or the Director of Digital Accessibility when making large-scale changes or implementing a new digital property of any kind.
- › **Ensure Accessibility Progress** – Continually keep their site on track toward achieving accessibility goals.
- › **Review Documents** – Review documents (PDFs, Word docs, slides, etc.) for accessibility issues before publishing to the unit site. Report any issues to the document author for correction.
- › **Help Content Creators Make Changes** – If a requested change violates standards, help the Content Creator find another solution that works. Alternatively, the Site Manager can implement accessibility solutions without the help of a Content Creator.

Note: In some cases, a Site Manager may also be the college or division’s Accessibility Liaison.

Content Creators / Daily Site Updates and Maintenance

Makes content changes and regular updates to the unit site or creates materials that go on the site.

“We create communications materials and may know a lot or nothing about the web.”

Responsibilities

- › **Respond to Requests from the Site Manager** – Make any changes requested from the Site Manager regarding accessibility of content that will go online or in any digital product.
- › **Update Site or Create Materials** – Make regular updates to their unit’s site or create unit communications materials that could ultimately go on the site.
- › **Review All Changes for Accessibility Issues** – Check that requested updates and new content follows digital accessibility guidelines.
- › **Propose Changes for Accessibility Compliance** – If a requested change violates accessibility standards, propose a solution that works for accessibility.
- › **Train in Accessibility Compliance** – Attend training and become well-versed in digital accessibility standards.
- › **Respond to Site Reviews** – Fix issues that the Site Manager asks to be fixed.
- › **Ensure Documents and Media Are Accessible** – Check each new PDF, Word document, and other files along with any videos or audio for compliance with digital accessibility standards before uploading to the site.
- › **Write Alt Text** – Craft careful, helpful alt text for all site images or all images to be used online.
- › **Pay Attention to Heading Hierarchy** – Divide content into semantically correct headings.

Division of IT / In-House Compliance

Develops new content and properties with accessibility in mind.

“We make sure all of our digital properties are built to comply with accessibility standards.”

Responsibilities

- › **Plan and Code for Accessibility** – Every requested project at any level must be developed in accordance with accessibility standards.
- › **Keep the Director of Digital Accessibility Informed of New Projects** – New digital undertakings will need an accessibility review from the Director of Digital Accessibility before and after launch.
- › **Get Training** – Attend specific developer accessibility training as defined by the Director of Digital Accessibility.
- › **Test Before and After Launch** – Test products for accessibility compliance, fixing any issues found.
- › **Work with Director of Digital Accessibility** – Respond to accessibility reviews and fix identified issues.

Procurement / Third-Party Product Compliance

Reviews new digital contracts to ensure accessibility compliance.

“We vet new digital properties and follow up on compliance fixes before finalizing contracts.”

Responsibilities

- › **Vet New Digital Properties** – Evaluate digital contracts in accordance with accessibility criteria. Flag areas where the digital tool or service does not comply and communicate needed fixes to the third-party, with the help of the Director of Digital Accessibility.
- › **Organize an Accessibility Review**– Work with the Director of Digital Accessibility to ensure potential new third-party products are examined according to set accessibility criteria and reviewed for compliance issues.
- › **Follow Up on Compliance Fixes** – Current products that are found to have compliance issues must be able to be remediated by their company owners within a specific time frame or replaced with accessible products.
- › **Ensure New Third-Party Products are Added to the Master List** – Once a new product is implemented, coordinate with the Director of Digital Accessibility to add it to the Master List.

procedures

Clear, simple, concise procedures will help UofSC achieve accessibility goals.

Procedure Assumptions

High-Level

Recommended procedures are categorized by type.

- › Reporting an Accessibility Issue
- › Responding to an Accessibility Issue
- › Training & Onboarding
- › Creating Content That Could Be Used Digitally
- › Buildings New Sites, Apps or Digital Properties
- › Third-Party Digital Tools & Platforms
- › Reviewing Digital Content & Properties

Initial Procedures for Finalization

Each procedure includes a series of high-level steps and actions. These steps are the current fully-fledged, institutional procedures.

Evolving

Because the university is a large, complex, diffuse organization, accessibility procedures may evolve. Further discussion and situations may reveal changes and additions.

Role-Based

Procedures refer to and are based on roles and responsibilities outlined earlier in this Road Map document. Adjustments to procedures may affect role definition and vice versa.

Procedures / Reporting an Accessibility Issue

Procedure / Policy	Actions
<h3>Report an Issue with Digital Accessibility</h3>	<ul style="list-style-type: none">› Who can report? Anyone within the school or general public can report issues through the website to the Director of Digital Accessibility, who will handle all communications related to issues found with UofSC digital properties.› Report the issue through the official form. The Report an Accessibility Issue form sends a high-priority message straight to the Director of Digital Accessibility. Issues reported in other ways will follow the same procedure but may take much longer to reach the director for follow-up.› Response to accessibility issues. Once the issue has been reported, the Director of Digital Accessibility will investigate and follow-up on the concern using the procedure for responding to accessibility issues.

Procedures / Responding to an Accessibility Issue

Procedure / Policy	Actions
<h3 data-bbox="237 483 705 591">Issues Reported from Individuals</h3>	<ul data-bbox="821 477 1955 1403" style="list-style-type: none"><li data-bbox="821 477 1955 545">› Investigation occurs. The Director of Digital Accessibility reviews the concern and identifies the best course of action.<li data-bbox="821 570 1955 716">› The Director of Digital Accessibility makes contact. The director reaches out to the individual who reported the issue, letting them know their message was received and is being looked into. At this time, the director may ask follow-up questions for clarity or provide a sense of next steps, if appropriate.<li data-bbox="821 740 1955 927">› The director notifies the appropriate unit, department or party. If changes or discussions are needed, the director notifies the appropriate unit, department or party of the issue and assigns next steps to fix or make plans to address the issue. The director may also reach out to the Digital Accessibility Committee to determine the best way forward to address more complex issues.<li data-bbox="821 951 1955 1097">› Fixes are made. The responsible unit, department or party either fixes or makes plans to address the issue, notifying the Director of Digital Accessibility when the issue is believed to have been taken care of. The responsible unit or department may work with the director or their assigned accessibility liaison to fix the issue.<li data-bbox="821 1122 1955 1268">› Accessibility review. The responsible unit, department or party either fixes or makes plans to address the issue, notifying the Director of Digital Accessibility when the issue is believed to have been taken care of. The responsible unit or department may work with the director or their assigned accessibility liaison to fix the issue.<li data-bbox="821 1292 1955 1403">› Follow up with the original reporter. The Director of Digital Accessibility reaches out to the individual who reported the issue and notifies them either that the issue has been fixed or of the plan in place to address the issue.

Procedures / Responding to an Accessibility Issue (continued)

Procedure / Policy	Actions
<p>Issues found by Digital Accessibility Team</p>	<ul style="list-style-type: none"> › The issue is found and brought to the attention of the digital accessibility team. A member of the digital accessibility team (the Director of Digital Accessibility, Digital Accessibility Committee, or accessibility liaisons) brings an accessibility issue to the attention of the director and/or committee for discussion and next steps. › The director notifies the appropriate unit, department or party. If changes or discussions are needed, the director notifies the appropriate unit, department or party of the issue and assigns next steps to fix or make plans to address the issue. The director may also reach out to the Digital Accessibility Committee to determine the best way forward to address more complex issues. › Fixes are made. The responsible unit, department or party either fixes or makes plans to address the issue, notifying the Director of Digital Accessibility when the issue is believed to have been taken care of. The responsible unit or department may work with the director or their assigned accessibility liaison to fix the issue. › Accessibility review. The Director of Digital Accessibility retests the screen or interaction in question to ensure the issue is fixed. If it is not, the director and responsible party repeat steps 2 through 4. › Issue is considered closed. Once the accessibility review comes back as passing compliance, the issue will be considered resolved.

Procedures / Responding to an Accessibility Issue (continued)

Procedure / Policy	Actions
<p>Issues Found in Accessibility Reviews</p>	<ul style="list-style-type: none"> › An issue or set of issues is identified during the course of a regular accessibility review. The Director of Digital Accessibility conducts a regular review of a digital property (site, app, course material, tools, etc.) and finds accessibility issues. › The issues are documented and communicated to the responsible party. The director documents the accessibility issues found plus how to fix them in the Accessibility Review Template and sends the completed template to the responsible unit, department or party. › The issues are fixed. If changes or discussions are needed, the director notifies the appropriate unit, department or party of the issue and assigns next steps to fix or make plans to address the issue. The director may also reach out to the Digital Accessibility Committee to determine the best way forward to address more complex issues. › Fixes are made. The responsible unit, department or party addresses the issues and may reach out to their designated accessibility liaison for extra help. The responsible party notifies the Director of Digital Accessibility that the issues are believed to have been fixed. › Accessibility review. The Director of Digital Accessibility retests the screen or interaction in question to ensure the issue is fixed. If it is not, the director and responsible party repeat steps 2 through 4. › Issue is considered closed. Once the accessibility review comes back as passing compliance, the issue will be considered resolved.

Procedures / Responding to an Accessibility Issue (continued)

Procedure / Policy	Actions
<h3>Legal Complaints</h3>	<ul style="list-style-type: none"> › Complaint received. A formal legal complaint is received by the university. › The Digital Accessibility Team is notified. The Director of Digital Accessibility and Digital Accessibility Committee are notified of the complaint. › Complaint received. A formal legal complaint is received by the university. › The issue is documented and communicated to the responsible party. The Director of Digital Accessibility reaches out to the responsible unit, department or party to determine how to fix the issue or to make a plan to address the issue. › Follow up with the university legal team and entity lodging the complaint. The director reaches out to the university legal team regarding steps being taken to address the issue and helps participate in conversations and communications with the party lodging the complaint, if necessary. › The issues are fixed or a plan is set in place to fix them. The responsible unit, department or party fixes the issue or comes with a plan to address the issue, with the help of the director and committee, if needed. The responsible party notifies the director when the accessibility issue is believed to be addressed. › Accessibility review. The director tests the screen(s) or interaction(s) in question to ensure the issue has been fixed. If it is not, the director and responsible party repeat steps 3, 5 and 6. › Issue is resolved and the complaint is considered to be closed. Once the issue is determined to be resolved, the director notifies the university legal team and participates in any closing conversations and communications with the party lodging the complaint.

Procedures / Training and Onboarding

Procedure / Policy	Actions
Accessibility Training	<ul style="list-style-type: none">› Establish an accessibility training program. Create a repeatable, self-paced program for teaching accessibility standards (UofSC and WCAG standards) via an online learning platform with evaluation modules.› Cater training sessions around attendees and their responsibilities. Training should be different depending on roles (e.g. Developers vs. Accessibility Liaisons vs. Content Creators). All training sessions should address high-level accessibility standards and requirements but also focus on the tasks that each attendee regularly performs.› Schedule regular accessibility training sessions each semester. All people that are newly responsible for content at the university will need to attend an accessibility training.

Procedures / Training and Onboarding (continued)

Procedure / Policy	Actions
Groups of Trainees	<ul style="list-style-type: none">› Train Faculty & Instructors. Faculty and instructors must attend a training session that teaches them how to make documents and presentations, audio and video files, and images and charts accessible.› Train Content Creators. Content Creators must attend a training session that teaches them how to make web pages (in OU Campus), documents and presentations, audio and video files, images and infographics, and social media posts and stories accessible.› Train Site Managers. Site Managers must attend a training session that teaches them how to make web pages, documents and presentations, audio and visual files, images, infographics and charts accessible.› Train Developers. Developers must attend a training session that teaches them how to make all code and markup, web pages, tool/app screens and images accessible.› Onboard and train Accessibility Liaisons. Accessibility Liaisons must be trained on all non markup areas of digital accessibility, OU Campus-specific instructions, how to respond to accessibility questions, and how to review for compliance.

Procedures / Creating Content That Could Be Used Digitally

Procedure / Policy	Actions
Documents	<ul style="list-style-type: none">› Ask: Does it really need to be a document? Content creators should avoid creating and sharing digital content as documents whenever possible. Instead, add content directly to the web page or screen.› Ensure that documents do follow accessibility guidelines. If the nature of the information truly prohibits it from being displayed on a web page and needs to be a document, content creators must follow digital accessibility guidelines as they pertain to creating accessible documents.› Review for accessibility compliance. The Site Manager or digital product owner should review the document for accessibility compliance before it is published or shared. PDFs should be scanned using Adobe Acrobat Accessibility Checker.› Review for accessibility compliance. The Site Manager or digital product owner should review the document for accessibility compliance before it is published or shared. PDFs should be scanned using Adobe Acrobat Accessibility Checker.› Fix any issues. If the accessibility review reveals issues, the file should be sent back to the person who created it to fix those issues.› Review again to ensure issues have been fixed. The Site Manager or digital product owner should review to ensure the issues have been fixed. If they have not, repeat steps 4 and 5.› Schedule a training for the document creator. If the person who created the file with issues has not received accessibility training, that person will need to schedule time to do so. Ideally, anyone creating documents that may be used digitally will have already been through digital accessibility training.

Procedures / Creating Content That Could Be Used Digitally (continued)

Procedure / Policy	Actions
Audio & Video	<ul style="list-style-type: none">› Follow accessibility guidelines when creating audio and video content. Content creators must follow digital accessibility guidelines as they pertain to creating accessible audio and video. Videos should be captioned (and, ideally, include audio descriptions). Videos and audio files should include a transcript to be shared along with the file.› Review media file for accessibility compliance. The digital product owner should review the media file for accessibility compliance before it is published or shared.› Fix any issues. If the accessibility review reveals issues, the file should be sent back to the person who created it to fix those issues.› Review for accessibility compliance. The Site Manager or digital product owner should review to ensure the issues have been fixed. If they have not, repeat steps 3 and 4.› Schedule a training for the document creator. If the person who created the file with issues has not received accessibility training, that person will need to schedule time to do so. Ideally, anyone creating audio or video files will have already been through digital accessibility training.

Procedures / Creating Content That Could Be Used Digitally (continued)

Procedure / Policy	Actions
Presentations	<ul style="list-style-type: none">› Follow accessibility guidelines when creating presentations. Content creators must follow accessibility guidelines as they pertain to creating accessible presentations.› Review media file for accessibility compliance. The presenter or digital product owner should review the presentation for accessibility compliance before it is published or shared.› Fix any issues. If the accessibility review reveals issues, they will need to be addressed by the presenter or the person who created the presentation.› Review for accessibility compliance. The presenter or digital product owner should review to ensure the issues have been fixed. If they have not, repeat steps 3 and 4.› Schedule a training for the document creator. If the person who created the presentation with issues has not received accessibility training, that person will need to schedule time to do so. Ideally, anyone creating presentations will have already been through digital accessibility training.

Procedures / Building New Sites, Apps or Digital Properties

Procedure / Policy	Actions
<h3>Building New Sites in OU Campus</h3>	<ul style="list-style-type: none">› Notify the Director of Digital Accessibility. Before you begin, you are responsible for notifying the director of your plans to create the site by emailing accessibility@sc.edu.› Establish the Site Manager. Each site needs at least one Site Manager.› Train the appropriate people. Anyone creating, editing or managing content that could be published to your new site will need to go through accessibility training if they haven't already. This may be in addition to OU Campus training if this is your first time building a site in OU Campus.› Build the site. The Digital Strategy team will work with you to build your site and prepare it for launch.› Accessibility review. The Director of Digital Accessibility will review your site for compliance before launch, noting any issues and ensuring they are corrected.› Site added to Master List. The Director of Digital Accessibility will add the site to the Master List once it has launched.

Procedures / Building New Sites, Apps or Digital Properties (continued)

Procedure / Policy	Actions
<h3 data-bbox="235 483 569 657">New Sites Built Outside of OU Campus</h3>	<ul style="list-style-type: none"> <li data-bbox="821 477 1955 545">› Notify the Director of Digital Accessibility. Before you begin, you are responsible for notifying the director of your plans to create the site by emailing accessibility@sc.edu. <li data-bbox="821 570 1955 753">› Justify your reasoning. You will need to make a case to the Digital Strategy team, the Digital Accessibility Committee and the Director of Digital Accessibility as to why your site cannot be built inside OU Campus. You will need an extremely convincing reason to build your site outside of the university's content management system. A decision will be made on a case-by-case basis. <li data-bbox="821 781 1881 889">› Train the team. Assuming your request to create a site outside of OU Campus is approved, all UofSC employees on your team will need to go through accessibility training if they haven't already. <li data-bbox="821 917 1927 1101">› Any vendor contracts need to include the proper accessibility checks. Vendors must agree to contractual language that they will build the site and its accompanying digital properties according to WCAG Level AA guidelines. Any third-party products used as part of the site must be accessible as well. See procedures for purchasing or using free third-party products for more. <li data-bbox="821 1128 1955 1273">› Accessibility review. The Director of Digital Accessibility will review your site for compliance before launch, noting any issues and ensuring they are corrected. All issues, even those that fall to a vendor to fix, must be corrected or have a plan for correction within a specific time frame before the site can launch. <li data-bbox="821 1300 1934 1369">› Site added to Master List. The Director of Digital Accessibility will add the site to the Master List once it has launched.

Procedures / Building New Sites, Apps or Digital Properties (continued)

Procedure / Policy	Actions
<h3>Developing New Digital Properties Internally</h3>	<ul style="list-style-type: none"> › Notify the Director of Digital Accessibility. Before you begin, you are responsible for notifying the director of your plans to create the site by emailing accessibility@sc.edu. › Train the development team. Before working on new digital properties, internal developers must go through accessibility training if they haven't already. › Any vendor contracts need to include the proper accessibility checks. Vendors must agree to contractual language that they will build the site and its accompanying digital properties according to WCAG Level AA guidelines. Any third-party products used as part of the site must be accessible as well. See procedures for purchasing or using free third-party products for more. › Build to digital accessibility standards. The new digital property must be built in accordance with accepted WCAG Level AA digital accessibility guidelines. › Accessibility review. The Director of Digital Accessibility will review your site for compliance before launch, noting any issues and ensuring they are corrected. All issues, even those that fall to a vendor to fix, must be corrected or have a plan for correction within a specific time frame before the site can launch. › Site added to Master List. The Director of Digital Accessibility will add the site to the Master List once it has launched. › Plan for ongoing accessibility reviews. The new digital property will be reviewed regularly, like any other UofSC site, app, tool or other interaction.

Procedures / Third-Party Digital Tools & Platforms

Procedure / Policy	Actions
<p>Purchasing or Using Free Third Party Digital Products</p>	<ul style="list-style-type: none"> › Notify the Director of Digital Accessibility. Before you begin, you are responsible for notifying the director of your plans to create the site by emailing accessibility@sc.edu. › Any vendor contracts need to include the proper accessibility checks. Vendors must agree to contractual language that they will adhere to WCAG Level AA guidelines, including making any requested updates to bring inaccessible areas of their product into compliance. › Perform a high-level accessibility review and test. The Director of Digital Accessibility must test the third-party product before it is purchased or can be used. › Accessibility issues are documented and communicated to the vendor. The Director of Digital Accessibility will make a report of any issues found and how to fix them to be delivered to the vendor. › Fixes are made. The vendor addresses any accessibility issues or makes a plan to address the issues within a specific time frame. The vendor and Digital Platform Business Owner notify the Director of Digital Accessibility once the issues are believed to be fixed. › Product added to Master List. The Director of Digital Accessibility will add the third-party product to the Master List once it has launched. › Plan for ongoing accessibility reviews. The new digital product will be reviewed regularly, like any other UofSC site, app, tool or other interaction. › Accessibility review after launch. The Director of Digital Accessibility will review the product again for accessibility issues before and after integration and/or launch. If any additional issues are found, the director, Digital Platform Business Owner and vendor repeat steps 4 and 5.

Procedures / Third-Party Digital Tools & Platforms (continued)

Procedure / Policy	Actions
<p>Third Party Digital Properties That Fail in a Majority of Accessible Areas</p>	<ul style="list-style-type: none"> › Communicate with the vendor. The Director of Digital Accessibility will communicate to the vendor that the digital property fails compliance on a number of levels and that there are only two solutions to move forward: (1) The vendor must make large-scale updates to the digital property to bring it into compliance with digital accessibility guidelines. (2) The university will not be able to approve or renew the vendor’s contract due to the digital property’s compliance failure.
<p>Required Accessibility Provision</p>	<ul style="list-style-type: none"> › Include a compliance provision in the contract. Any contract, obligation or agreement must include a provision that the product, service or tool is WCAG Level AA compliant or that any issues preventing compliance will be fixed within a specific time period requested by the university. › Write the contract to hold the university harmless. The contract, obligation or agreement must also hold the University of South Carolina harmless for any claims, damages, expenses, fines, costs, attorney’s fees and any other liability resulting from the university’s acceptance and/or use of the product, service or tool.

Procedures / Reviewing Digital Content & Properties

Procedure / Policy	Actions
<h3>Reviewing for Digital Accessibility Compliance</h3>	<ul style="list-style-type: none"> › The Director of Digital Accessibility performs automated and manual testing. Each digital property will be reviewed by the Director of Digital Accessibility for accessibility compliance. › The responsible unit or department receives their accessibility review. The Director of Digital Accessibility sends the review to the Site Manager, digital platform business owner or the party responsible for the digital property, identifying any issues and how to correct them. The report will include a compliance score for the digital property from 1 (many accessibility issues) to 5 (zero or virtually zero accessibility issues). › Fixes are made. The Site Manager or party responsible for the digital property fixes the issues in the review working with their assigned accessibility liaison if necessary to make the fixes. If fixes cannot be made immediately, the responsible party must have a plan for fixing the issues withing a specific period of time. The responsible party lets the Director of Digital Accessibility know when they believe the fixes to be made or a plan to be in place. › Follow up accessibility review. The Director of Digital Accessibility reviews the digital property in question again to ensure fixes have been made. If not, the director and responsible party repeat steps and 3 and 4. › Review considered closed until next time. Once all issues have been addressed, the audit process is finished and the issues are considered resolved until it's time for the digital property to come up for review again. › Consistent Low Compliance Scores. Units, departments and parties responsible for digital properties that have a low accessibility compliance score over the course of multiple review rounds may need additional training or a meeting with the Director of Digital Accessibility.

Procedures / Requesting Accommodations

Procedure / Policy	Actions
<h3>Requesting Accessibility Accommodations in Non-Digital Spaces</h3>	<ul style="list-style-type: none">› Contact the Student Disability Resource Center. The Center handles requests for accommodations in physical spaces, especially for in-person classroom settings.› Ensure all digital content is still accessible. If your course materials or other digital content is provided in a digital context, that digitally shared content must comply with the latest version of the WCAG Level AA accessibility guidelines even if someone in your class or unit has requested additional, in-person accommodations. The same is also true if no one in your class or unit has requested additional in-person accessibility accommodations.› Consider the difference between digital accessibility and accessibility accommodations. It may help to think of it like this: Digital accessibility compliance ensures that your digital content is accessible for everyone. An individual's accessibility accommodations help make all content, digital and otherwise, accessible to them.› Consider examples of non digital accessibility needs. It Examples include braille format for text, assistive technology procurement or training, real time captioning for an individual student in a physical classroom setting (in a course with no virtual component).

standards & benchmarks

Plan the creation and presentation of UofSC's public digital accessibility standards with other universities' successes and shortcomings in mind.

Benchmarks / Selection Criteria

Research

We researched a large number of online accessibility policies from other universities.

- › Universities with larger accessibility plans and initiatives that stretch far beyond their policies.
- › Online policies that are just one part of larger accessibility sections.
- › Universities who have created accessibility policies in response to a lawsuit.

Benchmark Sites

We identified four benchmarks for online accessibility policies from universities with similar challenges and goals to UofSC. These sites offer positive strategies to emulate and ineffective strategies to avoid.

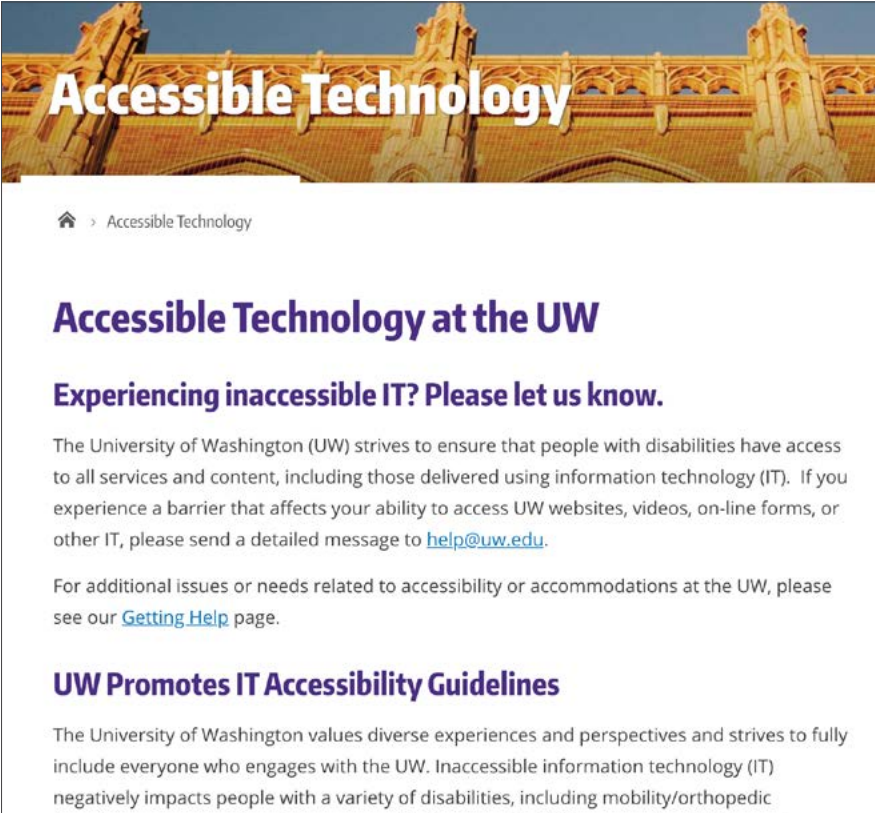
- › University of Washington
- › Purdue University
- › University of Montana
- › Pennsylvania State University

Benchmarks / University of Washington

washington.edu/accessibility/policy/

Well-organized and thorough.

Overall, University of Washington’s accessibility section is a good example for presenting clear procedures and guidelines that content creators can find and use easily.



Accessible Technology

Home > Accessible Technology

Accessible Technology at the UW

Experiencing inaccessible IT? Please let us know.

The University of Washington (UW) strives to ensure that people with disabilities have access to all services and content, including those delivered using information technology (IT). If you experience a barrier that affects your ability to access UW websites, videos, on-line forms, or other IT, please send a detailed message to help@uw.edu.

For additional issues or needs related to accessibility or accommodations at the UW, please see our [Getting Help](#) page.

UW Promotes IT Accessibility Guidelines

The University of Washington values diverse experiences and perspectives and strives to fully include everyone who engages with the UW. Inaccessible information technology (IT) negatively impacts people with a variety of disabilities, including mobility/orthopedic

A proactive approach.

The section begins with an immediate offer of help with a call to action to let the university know about inaccessible technology on their site.

✔ Pros

- › Easy-to-digest pages and structure.
- › Information is clearly organized.
- › Section provides checklists and guidelines for making technology accessible.
- › Tutorials are easy to read and follow.
- › Provides easy resources and help both for those with disabilities and for those creating digital products.

✘ Cons

- › Hard to find accessibility info from the university’s main page.
- › Some of the navigation labels are a little difficult to differentiate (e.g. “UW Policy” and “IT Accessibility Guidelines”).
- › Lots of navigation items could lead to user fatigue.
- › No glossary for unfamiliar terms.
- › Checklists organized by WCAG principles, which are difficult for non-experts (“perceivable,” “operable,” and “robust”).
- › The section’s actual policy is very slight and reads more like a mission statement than an actual policy (see next page).

Benchmarks / University of Washington

3. Scope

IT covered by the guidelines supports administrative, research, and academic applications, including the following examples:

- Websites
- Video and audio content
- Electronic documents
- Desktop, mobile, and cloud-based applications
- Content and learning management systems
- Email and calendars
- Library resources
- Computers and peripherals
- Information kiosks, telephones, digital signs, and other electronic equipment
- Classroom technologies

4. Standards

Technologies and standards evolve at a rapid pace. The UW looks to the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, developed by the World Wide Web Consortium (W3C), for guidance in meeting its IT accessibility commitments. WCAG 2.0 provides success criteria for measuring web accessibility, as well as provides useful metrics for products and services that are not specifically web-based. Where an IT product cannot be brought into compliance, campus units are responsible for providing an individual with a disability equivalent access.

5. Progress and Plan

The University of Washington has a lengthy history of proactively addressing IT accessibility issues. Its [IT Accessibility Progress and Plan](#) describes past efforts and future plans as it strives to ensure IT developed, procured, and used at the UW is accessible to individuals with disabilities.

Provides a comprehensive outline of accessibility efforts.

The section lays out what technology is covered, what is being done for compliance, and a host of other information supporting the university's accessibility policy.

ACCESSIBLE TECHNOLOGY

[UW Policy](#)

[IT Accessibility Guidelines](#)

[IT Accessibility Checklist & Tutorial](#)

[IT Accessibility Leadership](#)

[Progress & Plan](#)

[Getting Started](#)

[Creating Documents](#)

[Creating Videos](#)

[Developing Websites](#)

[Designing Online Courses](#)

[Procuring IT](#)

[Managing for Accessibility](#)

[Getting Help](#)


[Events & Collaboration](#)

[Laws, Policies & Standards](#)

Offers plainspoken, useful navigation.

Straightforward navigation options show everything in the section and allow easy access to a particular topic.

Benchmarks / University of Washington



Accessible Technology

Home > Accessible Technology > UW Policy – IT Accessibility

UW Policy – IT Accessibility

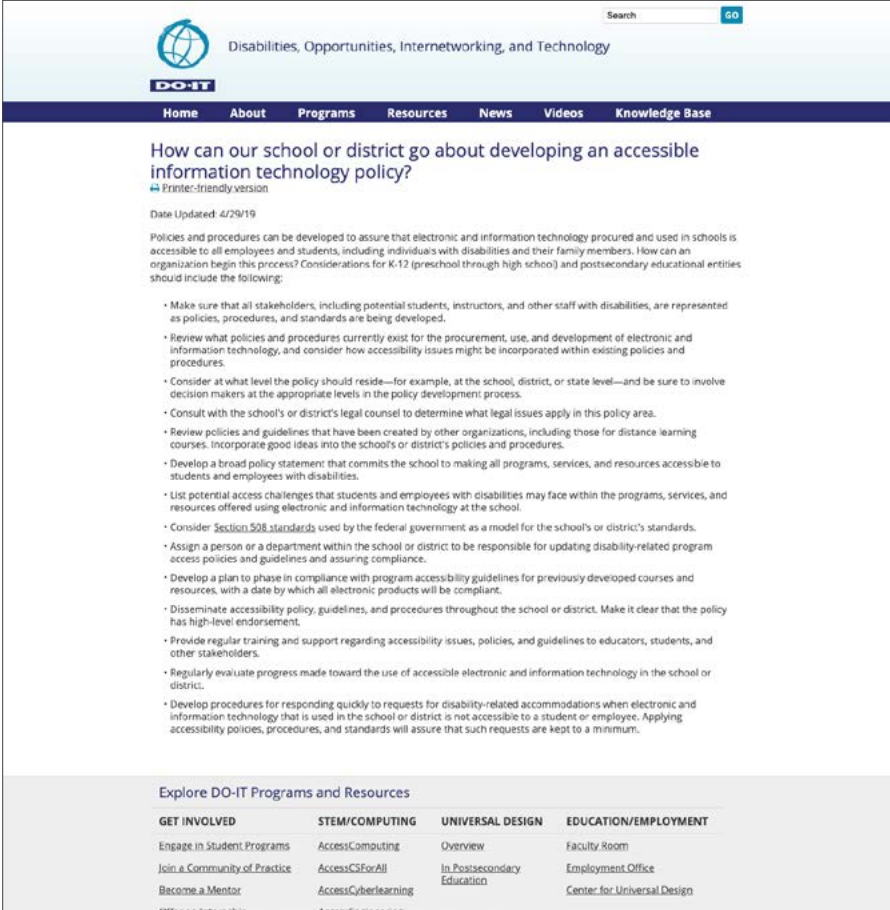
The University of Washington (UW) strives to ensure that people with disabilities have access to the same services and content that are available to people without disabilities, including services and content made available through the use of information technology (IT). IT procured, developed, maintained, and used by the UW should provide substantially similar functionality, experience, and information access to individuals with disabilities as it provides to others. Examples of IT covered by this policy include web sites, software systems, electronic documents, videos, and electronic equipment such as information kiosks, telephones, and digital signs.

The policy aligns with:

- the UW's [vision](#) to educate a diverse student body and its [values](#) of diversity, excellence, collaboration, innovation and respect.
- the UW's obligations under [Section 504 of the Rehabilitation Act of 1973](#).
- the [Americans with Disability Act of 1990 together with its 2008 Amendments](#).
- [Washington State Policy #188 – Accessibility](#).
- [UW Executive Order 31](#) – Nondiscrimination and Affirmative Action.
- [UW Administrative Policy Statement 2.3](#) – Information Technology, Telecommunications

Is this the policy?

It's difficult to determine at first whether the text on this page is the actual policy or just an introduction. This is, in fact, the lone UW accessibility policy. All guidelines and procedures are addressed in other sections.



Disabilities, Opportunities, Internetworking, and Technology

DO-IT

Home About Programs Resources News Videos Knowledge Base

How can our school or district go about developing an accessible information technology policy?

[Printer-friendly version](#)

Date Updated: 4/29/19

Policies and procedures can be developed to assure that electronic and information technology procured and used in schools is accessible to all employees and students, including individuals with disabilities and their family members. How can an organization begin this process? Considerations for K-12 (preschool through high school) and postsecondary educational entities should include the following:

- Make sure that all stakeholders, including potential students, instructors, and other staff with disabilities, are represented as policies, procedures, and standards are being developed.
- Review what policies and procedures currently exist for the procurement, use, and development of electronic and information technology, and consider how accessibility issues might be incorporated within existing policies and procedures.
- Consider at what level the policy should reside—for example, at the school, district, or state level—and be sure to involve decision makers at the appropriate levels in the policy development process.
- Consult with the school's or district's legal counsel to determine what legal issues apply in this policy area.
- Review policies and guidelines that have been created by other organizations, including those for distance learning courses. Incorporate good ideas into the school's or district's policies and procedures.
- Develop a broad policy statement that commits the school to making all programs, services, and resources accessible to students and employees with disabilities.
- List potential access challenges that students and employees with disabilities may face within the programs, services, and resources offered using electronic and information technology at the school.
- Consider [Section 508 standards](#) used by the federal government as a model for the school's or district's standards.
- Assign a person or a department within the school or district to be responsible for updating disability-related program access policies and guidelines and assuring compliance.
- Develop a plan to phase in compliance with program accessibility guidelines for previously developed courses and resources, with a date by which all electronic products will be compliant.
- Disseminate accessibility policy, guidelines, and procedures throughout the school or district. Make it clear that the policy has high-level endorsement.
- Provide regular training and support regarding accessibility issues, policies, and guidelines to educators, students, and other stakeholders.
- Regularly evaluate progress made toward the use of accessible electronic and information technology in the school or district.
- Develop procedures for responding quickly to requests for disability-related accommodations when electronic and information technology that is used in the school or district is not accessible to a student or employee. Applying accessibility policies, procedures, and standards will assure that such requests are kept to a minimum.

Explore DO-IT Programs and Resources

GET INVOLVED	STEM/COMPUTING	UNIVERSAL DESIGN	EDUCATION/EMPLOYMENT
Engage in Student Programs	AccessComputing	Overview	Faculty Room
Join a Community of Practice	AccessCSForAll	In Postsecondary Education	Employment Office
Become a Mentor	AccessCyberlearning		Center for Universal Design
Offer an Internship	AccessEngineering		

Presents competing accessibility sites.

Confusingly, another UW accessibility initiative, DO-IT (washington.edu/doit) has a completely separate site that lists its own accessibility policies.

Benchmarks / Purdue University

purdue.edu/policies/information-technology/s5.html

A complete view of policies and procedures, if lacking tactical guidance.

Purdue’s accessibility standard lays out fine detail for what it entails and who is responsible. However, it offers little to actually help those responsible create accessible digital products.

The screenshot shows the Purdue University Policy Office website. The header includes the Purdue University logo and the text 'University Policy Office'. Below the header is a navigation menu with links: Home, Find a Policy, About Policies, Policy Owner Resources, and Helpful Links. The main content area is titled 'Information Technology Policies' and features the policy title 'ELECTRONIC INFORMATION, COMMUNICATION AND TECHNOLOGY ACCESSIBILITY (S-5)'. Below the title, it lists the standard (S-5), the responsible executive (Vice President for Ethics and Compliance), the responsible office (Office of Institutional Equity), the date issued (June 1, 2017), and the date last revised (N/A). A 'TABLE OF CONTENTS' section lists the following items: [Individuals and Entities Affected by This Standard](#), [Contacts](#), [Statement of Standard](#), [Responsibilities](#), [Definitions](#) (defined terms are capitalized throughout the document), [Related Documents, Forms and Tools](#), [History and Updates](#), and [Appendix](#).

Easy to scan and navigate but lacking in actual help.

The section clearly indicates what is involved in accessibility standards and provides links to topics. However, if you want to know how to actually make a product accessible, you will have to look elsewhere.

✓ Pros

- › Easy to see topics within the policy.
- › The policy looks and reads like a policy — there is no question what this section is presenting.
- › Includes many sections UofSC should address plus some to consider: responsibilities, scope, glossary, contacts, related resources.
- › Tutorials are easy to read and follow.
- › Provides easy resources and help both for those with disabilities and for those creating digital products.

✗ Cons

- › Policy is written in legalese and in long, dense paragraphs which may make it hard for some to parse.
- › Some of the navigation labels are in legalese, making them hard to identify right away (“Statement of Standard”).
- › Does not offer practical help, either for those with disabilities or for content creators trying to make products accessible.
- › Does not include certain sections UofSC would like to address: progress and plan, goals, specific procedures.
- › No clear way to report an accessibility issue.

Benchmarks / Purdue University

STATEMENT OF STANDARD

The creation and dissemination of knowledge is a defining characteristic of universities and is fundamental to Purdue University's mission of learning, discovery and engagement. Delivery of information electronically is central to carrying out this mission. Acknowledging this fact, the University is committed to ensuring equal access to information for all its constituencies.

This standard establishes minimum requirements for the accessibility of Electronic Information, Communication and Technology necessary to meet the University's goals and ensure compliance with applicable law. The University will meet the standards and guidelines outlined in the **Web Content Accessibility Guidelines (WCAG) 2.0** Level AA for all Web-based Electronic Information, Communication and Technology. Further, it will follow the **Guidance on Applying WCAG 2.0 to Non-Web Information and Communications Technologies (WCAG2ICT)**.

Specific applications of this standard are as follows:

- **Web:** All websites, Web pages and Web-based software published or hosted by the University or used to conduct University business (including remotely hosted sites and software) must meet the above standards and indicate in plain text a method of contact for Persons with Disabilities having trouble accessing content.
- **Instructional Materials:** All electronic instructional materials, optional and required, must be Accessible. This includes, but is not limited to, syllabi, textbooks, presentations and handouts delivered within the University's learning management system, via email or via another electronic means for face-to-face classes as well as e-learning courses. It also includes electronic instructional activities such as instructional videos, online collaborative writing, Web conferencing, blogging, etc.
- **Documents:** All University produced, maintained or distributed electronic documents must be Accessible. This includes, but is not limited to, word processing documents, PDFs, presentations, publications and spreadsheets that are scanned, uploaded, posted or otherwise published or distributed electronically.
- **Electronic Media:** All electronic multimedia resources used by the University for instruction, communication, marketing, promotion or other academic or business purposes must be Accessible. Video must be closed-captioned and audio-described and audio resources must be transcribed.
- **Software, Hardware and IT Systems:** All software, hardware and IT systems used for academic and research purposes, administrative and business purposes, and customer service must be Accessible and produce Accessible products or content, which includes compatibility with assistive technology. Software, hardware and IT systems include, but are not limited to, learning management, content management, library systems, email, human resources administration, financial systems, course or event registration, freeware, shareware, enterprise systems and online or remotely hosted software.
- **Procurement/Purchases:** The University will purchase electronic products and solutions, including, but not limited to, software, operating systems, Web-based applications, video and multimedia, that meet or exceed the above Accessibility standards. The University recommends that all requests for proposals from and contracts with vendors include language that outlines this requirement and provides stipulations for how the vendor is expected to demonstrate compliance.

RESPONSIBILITIES

Director, Office of Institutional Equity

- Administer and interpret this standard.
- Initiate a review of and make necessary revisions to this standard as necessitated by regulatory and technological changes.
- Provide guidance to Equal Opportunity Compliance Officers on conducting audits and reviewing requests for exceptions.

Equal Opportunity Compliance Officers

- Conduct random audits for compliance with this standard.
- Review requests for exceptions to this standard on a case-by-case basis and document the decision.

IT, Marketing and Any Other Departments Authorized to Select and Provide IT Resources for Business or Academic Purposes

- Ensure that any content management system or other Web production software be Accessible and able to produce Accessible websites.
- Ensure that learning management systems and online conferencing systems are Accessible and compatible with assistive technology.
- Ensure that all software and other applications are Accessible and compatible with assistive technology.
- Ensure that all hardware, video and audio equipment, and other IT resources are compatible with assistive technology, and that assistive technology is made readily available to faculty, staff and students using University IT resources.

Colleges, Schools, Departments, Programs and Units

- Ensure compliance with this standard.
- Purchase and produce only Accessible Electronic Information, Communication and Technology and update existing media, content and systems as they are put into use.
- Ensure that departmentally owned or managed classrooms and labs are equipped with IT resources that are capable of delivering Accessible Electronic Information, Communication and Technology and are compatible with assistive technology.
- Ensure that all hardware, software, applications, systems, video and multimedia purchased or developed by the unit are Accessible and, as applicable, compatible with assistive technology.
- Promptly, upon request by a Person with a Disability, provide Web content published prior to March 15, 2010, or maintained as an archived page in an Accessible format.
- Submit to the campus Equal Opportunity Compliance Officer a written request for an exception in the event it is not technically possible or may require extraordinary measures to make specific Electronic Information, Communication and Technology Accessible.

Procurement/Purchasing Departments

Offers a clearly defined policy.

The Purdue accessibility policy is fairly comprehensive and makes an effort to define all technologies that fall under the standard.

Defines responsibilities thoroughly.

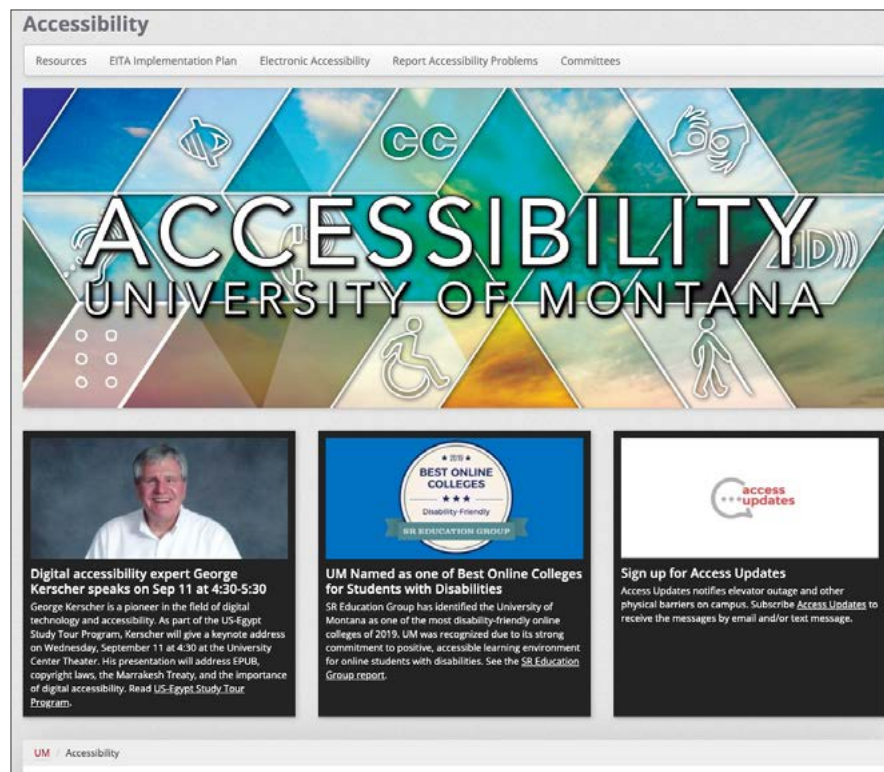
Purdue's accessibility policies include responsibilities for all roles involved, even university procurement.

Benchmarks / University of Montana

<http://www.umt.edu/accessibility/default.php>

Not the fanciest, but all-inclusive.

The University of Montana presents an almost all-encompassing view of accessibility at the university - the policy, detailed procedures, guidance for creators, reporting, and more.



Designed like a website.

Presents accessibility information as a separate subsite of the main campus URL rather than as a section of policies or a section of compliance.

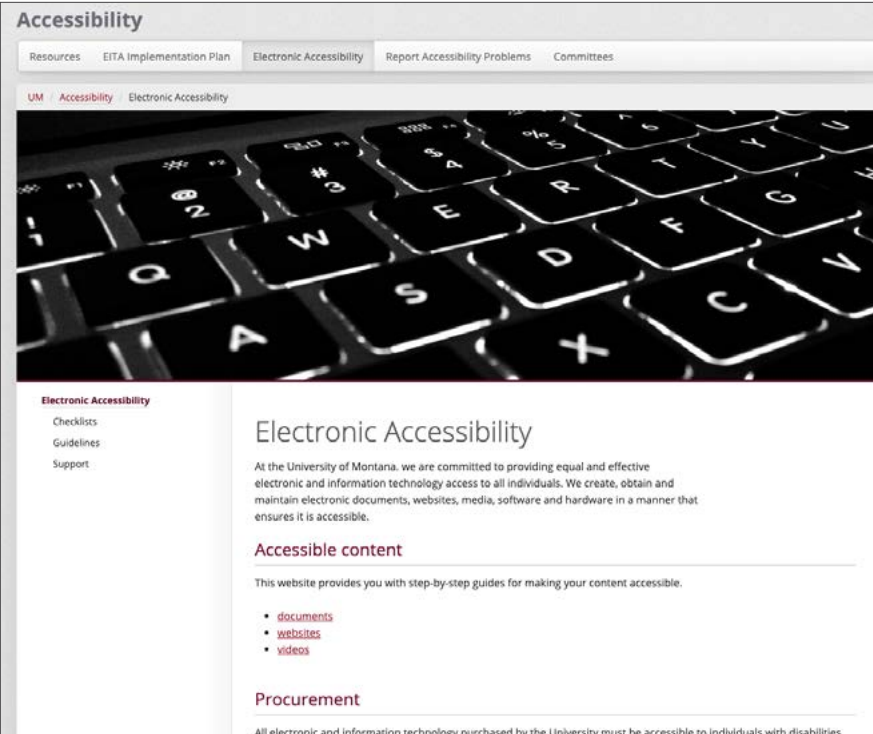
✓ Pros

- › Full subsite gives this section plenty of room to accomplish comprehensive accessibility policy, reporting, and guidance.
- › Users can report accessibility problems right from the navigation.
- › Offers guidance for creating products and multiple wayfinding paths for varied users (leaders, staff, developers, web creators, etc.).
- › Checklists and guides are easy to follow, if a little wordy.
- › Provides a one-stop shop for accessibility at MU.
- › Policy and procedures are far-reaching and cover all technology at MU including hardware and classroom materials.

✗ Cons

- › Policy and procedures are a little difficult to find because they are hidden under “EITA Implementation Plan.”
- › Difficult to find specific procedures quickly.
- › The implementation plan page says nothing about what has been done and what the plans are for the future.
- › Not the most modern design.
- › Hard-to-follow, wordy procedures are not written in plain English.

Benchmarks / University of Montana



Accessibility

Resources EITA Implementation Plan **Electronic Accessibility** Report Accessibility Problems Committees

UM Accessibility Electronic Accessibility

Electronic Accessibility

- Checklists
- Guidelines
- Support

Electronic Accessibility

At the University of Montana, we are committed to providing equal and effective electronic and information technology access to all individuals. We create, obtain and maintain electronic documents, websites, media, software and hardware in a manner that ensures it is accessible.

Accessible content

This website provides you with step-by-step guides for making your content accessible.

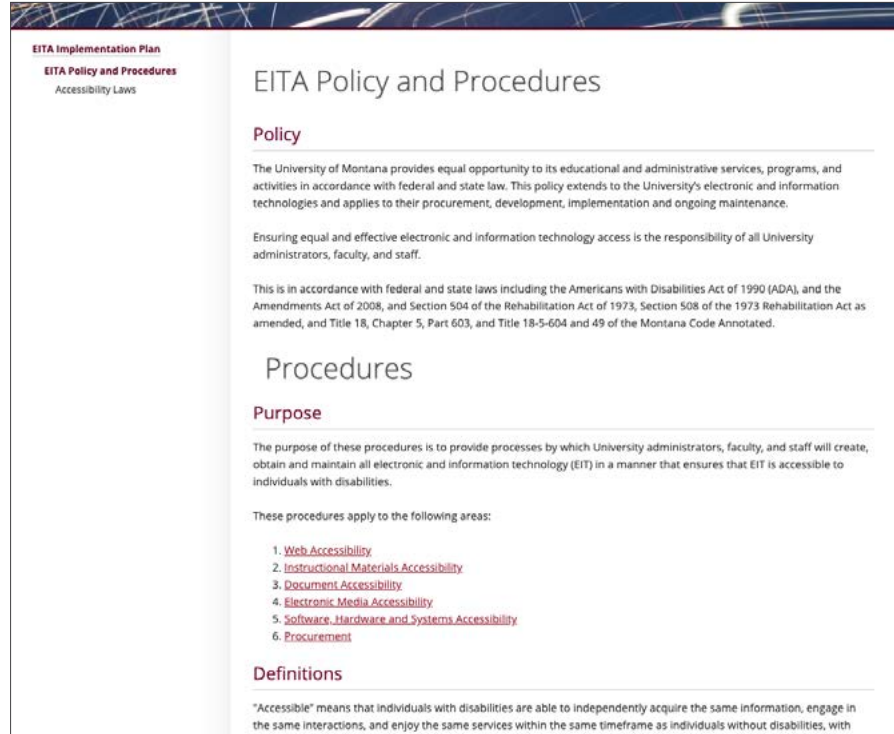
- documents
- websites
- videos

Procurement

All electronic and information technology purchased by the University must be accessible to individuals with disabilities.

Provides tactical help for those creating digital products.

The site's "Electronic Accessibility" section (vaguely named for a guidelines section) offers help for creating accessible products by topic, creator role, and type of assistance.



EITA Implementation Plan

EITA Policy and Procedures

Accessibility Laws

EITA Policy and Procedures

Policy

The University of Montana provides equal opportunity to its educational and administrative services, programs, and activities in accordance with federal and state law. This policy extends to the University's electronic and information technologies and applies to their procurement, development, implementation and ongoing maintenance.

Ensuring equal and effective electronic and information technology access is the responsibility of all University administrators, faculty, and staff.

This is in accordance with federal and state laws including the Americans with Disabilities Act of 1990 (ADA), and the Amendments Act of 2008, and Section 504 of the Rehabilitation Act of 1973, Section 508 of the 1973 Rehabilitation Act as amended, and Title 18, Chapter 5, Part 603, and Title 18-5-604 and 49 of the Montana Code Annotated.

Procedures

Purpose

The purpose of these procedures is to provide processes by which University administrators, faculty, and staff will create, obtain and maintain all electronic and information technology (EIT) in a manner that ensures that EIT is accessible to individuals with disabilities.

These procedures apply to the following areas:

- Web Accessibility
- Instructional Materials Accessibility
- Document Accessibility
- Electronic Media Accessibility
- Software, Hardware and Systems Accessibility
- Procurement

Definitions

"Accessible" means that 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.

Policy is distinct from procedures.

The MU accessibility policy is very clearly separate from accessibility procedures, one of the only benchmarks to make this clear distinction. Some procedure category labels aren't as straightforward as they could be and once inside these sections, individual procedures can be hard to scan for.

Benchmarks / Pennsylvania State University

<https://accessibility.psu.edu/>

Has all the parts and pieces, if only you could find them.

Penn State's policy is comprehensive but full of jargon and impossible to find. Their accessibility section is cobbled together, resulting in a maze of links and content.

The screenshot shows the Penn State website's administrative policies page for AD69 Accessibility of Electronic and Information Technology. The page is titled "ADMINISTRATIVE POLICIES" and "AD69 Accessibility of Electronic and Information Technology". It lists the policy status as "Active", the subject matter expert as Christian Vinten-Johansen, and the policy steward as the Vice President for Administration. The "Contents" section includes links to Purpose, Scope, Definitions, Standards, Policy, Active EIT, Legacy EIT, Archived Information Resources, Statement of Accessibility on all Web Pages and Web-based Applications, Exemptions from the Policy, Training and Resources, Requesting Exemption From Policy, Further Information, and Cross References. The "PURPOSE" section states that Penn State is committed to ensuring equal access to information, programs, and activities through its information technologies, web pages, web-based applications, operating system-based applications, online instructional content, services, and resources ("electronic information technology" or "EIT") for all its constituencies. The "SCOPE" section states that the policy applies to all official University electronic and information technology (EIT) used to conduct core University academic and business activities. The "DEFINITIONS" section is partially visible at the bottom.

✔ Pros

- › Lots of guidance, resources, and knowledge offered throughout the accessibility section.
- › Fairly comprehensive accessibility policy.
- › Defines the policy for both active and legacy technology.

✘ Cons

- › Accessibility section shuttles users with disabilities off to IT with no clear way to report an issue.
- › It's all but impossible to find specific information, including the actual Penn State accessibility policy.
- › Not the most modern design.
- › Procedures are wordy and not written in plain English, which may make them hard to follow.
- › Policy is missing sections UofSC would want to include: responsibilities, goals, progress and plan, etc.

Policy and procedures are very hard to find.

The actual Penn State policy lives in the universities "Policy" section and is incredibly hard to find in the accessibility section. In fact, we had to Google it.

Benchmarks / Pennsylvania State University

The screenshot shows the PennState Accessibility website home page. The header includes the PennState logo and the text "Accessibility and Usability of Penn State". A navigation bar contains links for Home, Accommodations, Backers, Courses, Websites, Multimedia, Testing/Triage, Software, and Training. The main content area is titled "Home" and features a message about ensuring web pages are usable for users with different disabilities. Below this, there are several sections: "Get Started" with links to Accommodations, Courses, Guidelines, Websites, Multimedia, Testing/Triage, Software, and Training; "PSU Initiatives" with links to All Committee, Annual Reports, Implementation Plan, NFB Settlement Text, and Web Libraries; "Hot Topics" with links to Canvas, Captions, Course Guidelines, Policy, Microsoft Office, and PDF; and "What's New?" with a link to New Content. A graphic with the text "AND" and a braille symbol is also present.

The screenshot shows the PennState Accessibility website HTML Guide page. The header is identical to the home page. The main content area is titled "HTML Guide" and contains a message about accessibility guidelines for web site components. Below this, there are three columns of links categorized by letter: "A-D" (Abbreviations in HTML, Accessibility Test Pages, Untitled On Purpose - An Inaccessible Page, ARIA Landmarks, CAPTCHAs, Dreamweaver, CSS Stylesheets, CSS Relievers, CSS Logical Text Order, Drop-Down or Floating Menus), "E-J" (Flash Files, Font/Text Layout for Web Pages, Bold & Italic Formatting, Color & Contrast, Font Face on the Web, Font Size on the Web, Foreign Language Web Content, Language Tags in HTML, Forms in HTML, Tables, Frames and Iframes, Headings (H1, H2, H3...), Image ALT Tag in HTML, Image Maps in HTML), and "K-Z" (Keyboard Accessibility, Links on a Web Page, Lists in HTML, Multimedia (Video/Animation), Navigation, Pop-Up Windows, Skin Navigation, PDF Files, Redirects/Timed Responses, Scripts for Web Pages, Alert Boxes, Datasheets, Dynamic Pages, Tables for Data in HTML, Complex Table Examples, Multiple Columns in HTML, Titles for Web Pages, WCAG 2.0 Guidelines). A button labeled "ABBR to WCAG" is also visible.

Where am I in the site? How do I find anything here?

Unless you are on a top level navigation item, the site gives no help at all as to what section a page might be in or what else is available to see there. Once again, pages are poorly organized. Here, you have to know the letter corresponding to your topic and hope it's in the list.

Vague categories with lots of options make content hard to find.

Neither the main navigation nor the lists of links in the main content area are well-organized or well-labeled, making it a lot of work to find specific content.

Dos and Don'ts

Dos

Make accessibility information easy to find.

Faculty and staff need easy access to accessibility resources, policies and procedures.

Give a way to report issues.

The general public needs to know how to contact the University regarding accessibility issues if needed.

Use simple language.

Write for the average Joe. Pay special attention to making policies and procedures easy for people to understand so they are more likely to understand and adopt them.

Offer tactical help.

Providing guides, checklists, and assistance for those trying to create accessible digital products will make them more successful and communicate the University's investment in accessibility to the public.

Organize content carefully.

There's a lot of content to present. Organize topics and sections so that real people can find their way around.

Don'ts

Don't use legalese.

Be clear without resorting to language that's difficult to understand. This goes double for words used for names, labels, and titles.

Don't bury accessibility content.

University staff and the general public should be able to find the University's content easily and all in one spot.

Don't organize content by internal hierarchy.

Present accessibility content in a way that's easy for those outside the University to navigate and use, even if that means it doesn't exactly match internal structure or use internal lingo.

Avoid overdoing navigation.

Navigation items within the accessibility section should be limited and straightforward, not to exceed ~6 items. Fewer is even better.

timeline & progress

Use the following timeline to plan implementation of recommendations from this Accessibility Road Map and to review past progress.

Timeline & Progress / Where We Are

Ongoing Work

Continued Education

Training Upon Request

Digital accessibility training is currently being offered on a request basis while official training content is finalized.

New Video and Educational Material Releases

The Digital Accessibility Committee is working on new videos and other content that highlights real students using their assistive technology to navigate online and talking about why digital accessibility is important for them.

Training & Onboarding

Finalize Training Content

Training for digital accessibility will be split into topics specific to certain roles so that the information is tailored to each person's actual work. The Digital Accessibility Committee is finalizing this training, beginning with education modules for instructors and content creators.

Onboarding Accessibility Liaisons

Requests are being sent out for volunteers or recommendations for accessibility liaisons in colleges and divisions that do not have anyone assuming the role as of yet. In situations where there are no volunteers, the college's dean or division's chair will be asked to appoint someone.

Reviews & Checklists

Procurement Accessibility Checks

The Digital Accessibility Committee is set to meet with members of Procurement and the Technical Review Board to set digital accessibility requirements in place for new and renewed digital contracts.

Sending First Accessibility Reviews

The Digital Accessibility team has been reviewing digital content for accessibility compliance and will be sending the first reports to site managers or digital platform business owners, following the digital accessibility review process. These reports outline any issues found with the digital content or property and how to fix them. Reports are prioritized in order of highest traffic content and content that is most mission critical to the university.

Timeline & Progress / Where We're Going

Future Milestones

2020 (End of Year)

First Yearly Progress Report

The Director of Digital Accessibility, in conjunction with the Digital Accessibility Committee, will author a progress report, outlining where digital accessibility stood at the beginning of the year and the strides that have been made during the course of the. Success will be measured and reported at quantitative and qualitative levels.

2021

Official Training Begins

Beginning with instructors and content creators, those who create, edit or manage digital content and properties for the university will go through required digital accessibility training.

No Non-Accessible Educational Platforms Allowed

As of the Spring 2021 semester, instructors will not be permitted to choose platforms for online classrooms that do not comply with digital accessibility guidelines.

All New Videos Captioned

Starting in 2021, it will be a university requirement to caption any new video created and shared in association with UofSC.

2022 (and Beyond)

All New Documents Accessible

All documents, including PDFs, presentations and spreadsheets, shared in association with the university will be made accessible, provide an accessible alternative to the content or be removed as digital content.

Accessible Digital Signage

All digital signage will have accessibility requirements, either that the sign itself be accessibility compliant and/or that the information communicated via digital signage be readily available in an accessible format elsewhere.

Timeline & Progress / Where We're Going (continued)

Future Milestones

2022 and Beyond (continued)

Accessibility Champion Appreciation

The Digital Accessibility Committee will identify and recognize those who repeatedly practice digital accessibility compliance and champion digital accessibility at the university.

Escalated Training Begins

If an individual or unit repeatedly has significant accessibility issues with their digital content, they may be required to complete additional training or meet one-on-one with the Director of Digital Accessibility.

Other Campuses

Once digital accessibility efforts at the Columbia main campus are set and moving along smoothly, the Digital Accessibility Committee will begin to work with other University of South Carolina system campuses to set any necessary policies, procedures, training or other protocols in place.

Creation of Testing Committee

The testing committee will be made up of people who use assistive technology in their daily lives to help catch digital accessibility issues not previously noted in automated and manual testing by the Director of Digital Accessibility.

New Initiatives

Digital accessibility is ever-evolving. As new requirements or considerations arise, the Digital Accessibility Committee will determine and carry out new needed education or procedural initiatives to do with the digital accessibility effort at UofSC.

Student Groups' Digital Content

All student groups on campus will have procedures in place for distributing accessible content, including forms and other digital tools used as a course of their activities. These procedures will include a requirement for all organization officers to go through accessibility training and a statement from each organization to include in their governing documents that they will create accessible digital content.

Timeline & Progress / Where We've Been

Major Milestones

2020

Director of Digital Accessibility Search

A position was created, job description posted and interviews conducted to find the university's first Director of Digital Accessibility.

Digital Accessibility Committee Formed

Made up of members from key areas, the Committee meets regularly to discuss resolution of digital accessibility issues and next strategic steps to carry out the effort across the university.

Campus-Wide Education

The Digital Accessibility Committee met with and presented to groups across campus, including committees, faculty members, digital communicators, compliance groups, colleges and divisions.

Faculty & Staff Open Forums

The Digital Accessibility Committee hosted a series of webinars to explain digital accessibility effort and address any questions or concerns.

Accessibility Website Launched

This site functions as the central hub for all things digital accessibility at the university, including guides and tutorials for creating accessible content, procedures, responsibilities, leadership and contacts, as well as the timeline and progress information you're reading now.

Policy Ratified

An official digital accessibility policy defines compliance at the University of South Carolina Policy IT 5.00 - Digital Accessibility.

Hired Director of Digital Accessibility

The Committee approved and hired a new Director of Digital Accessibility.

Creation of Master List

Full inventory of accessibility issues taken.

Timeline & Progress / Where We've Been (continued)

Major Milestones

2019

Strategic Digital Accessibility Plan Created

This plan, known as the “Digital Accessibility Road Map” sets forth a continued commitment to constantly improving digital accessibility at the University of South Carolina, including a short-term and long-term plan to ensure all digital content and properties comply with accepted accessibility standards.

U.S. Office of Civil Rights Case Closed

The University of South Carolina closed the case with the United States Office of Civil Rights by remediating the issues named in the complaint, establishing a strategic plan to address future issue and demonstrating an ongoing commitment to improving digital accessibility at the university.

2018

Remediation of High-Priority Accessibility Issues

Content creators and development professionals from all over the university came together to resolve accessibility issues noted in the complain from the U.S. Office of Civil Rights. Significant accomplishments include the creation of an accessibility-compliant template for all university websites, an accessibility issue reporting form and significant reduction of inaccessible content shared via university digital properties.

Introduction of Blackboard Ally

Blackboard Ally was made available across the university system, allowing all instructors to check their course materials for digital accessibility and fix any issues that would prevent barriers to accessibility.

2017

U.S. Office of Civil Rights Case Opened

A case was opened through the United States Office of Civil Rights requiring the remediation of the most pressing accessibility issues on university sites and online services as well as the creation of and adherence to a long-term plan for continued accessibility efforts at the university.

2016

sc.edu Site Redesign Complete, First Accessibility Reviews

Websites associated with sc.edu now managed via the same content management system, allowing for better consistency and user experience across all sites. Part of this effort included conducting the university's first web accessibility reviews for each division.

Timeline & Progress / Where We've Been (continued)

Major Milestones

2013

sc.edu Site Redesign Started

This enormous initiative brought websites associated with sc.edu, amounting to a massive number of webpages, into the same content management system, allowing for a more consistent and user-friendly experience as well as easier management and oversight of the university's digital content.

Onward.