

Attachment 5

Information and Communication Technology Accessibility Strategic Plan

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The first face-to-face meeting of the workgroup was held on June 8, 2015. The workgroup was charged with providing FSCOT with a preliminary plan in regards to accessibility of information and communication technology (ICT) university-wide. To those ends, the committee worked on the following:

- a review of recent legal and legislative actions related to ICT accessibility in higher education;
- a review of Kansas State University policies and practices related to ICT accessibility; and
- a list of suggested corrective actions, including a detailed audit of ICT accessibility practices and funding for targeted efforts.

Workgroup members have expressed concern that there may be insufficient response to any proposed plan given slow progress to date even with solid work by prior committees.

Time is now. However, there is an urgency to this topic that has not been present before due to numerous complaints and lawsuits filed in the last few years against institutions of higher learning. There are far too many to list, but a few recent lawsuits have involved Massachusetts Institute of Technology along with Harvard University for the lack of online captioning of videos; Louisiana Tech University over inaccessible course materials; and earlier this year the Justice Department intervened in the lawsuit against Miami University (Ohio) by alleging that Miami University violated Title II of the Americans with Disabilities Act. This particular lawsuit involves inaccessible websites, learning management system software, and course materials.

Once a complaint or a lawsuit has been filed, the investigation that takes place is not limited to the complaint but encompasses the totality of the institution's information and communication technology. For example, the complaint against the University of Montana involved inaccessible class assignments, live chat feature and discussion board in Moodle, inaccessible documents scanned as images, videos not captioned; library databases; and classroom clickers. However, the resolution agreement entered by the institution requires policy changes, creation of procedures including a grievance procedure, procurement guidelines, and staff training through presentations and workshops. The hiring of additional staff was also required including an information and communication technology (ICT) Coordinator. A student survey was conducted, as well as an accessibility audit. After the audit, a corrective action strategy was created which includes library services, webpages, classroom technology, student management system, learning management system, and the creation of a reporting procedure to the Office of Civil Rights. Throughout this process, a strict timeline is imposed.

The old model of a student requesting an accommodation whether it be accessible (searchable) PDFs, captions to audio and video files, or the ability to enroll independently is an antiquated model of delivery of materials and services. This model puts the responsibility on the student to make the request and any follow-up that is necessary. It gives the impression that the university is not ready to accommodate the student and at best provides materials and services "just in time," and at worst, provides some alternative that is unequal and inadequate.

Student-centered concerns. Students today are used to interacting with technology in their preferred format whether that be texting, using voice recognition, or screen reader options right out-of-the-box – think smartphones. Smartphones, tablets, and computers have magnification programs, voice recognition, and text-to-speech options built into the operating system. Students with disabilities are coming to campus with the expectation that materials, programs, and services are accessible from the outset and not something that they must request.

Detailed guidance. For a long time now, administrators in higher education have asked for more guidance in the area of accessibility; they have explained inaction as a response to the lack of specific standards. At this time, the United States Access Board has posted the proposed Refresh of the Section 508 Standards and Section 255 Guidelines for Information and Communication Technology. Some major revisions include:

- incorporation of the WCAG 2.0 and application of associated success criteria to websites, as well as offline electronic documents and software;
- requirement of real-time text functionality (text that is transmitted character by character as it is being typed) for software and cloud products that provide real-time, two-way voice communication (**such as Zoom**);
- specifies the types of internal or non-public facing electronic content covered that constitutes official business of the agency;
- further details the required compatibility of covered technologies, including operating systems, software development toolkits, and software applications with assistive technology.

In 2013, Representative Thomas Petri, Republican from Wisconsin, with fifty-three cosponsors, introduced H.R. 3505, Technology, Equality and Accessibility in College and Higher Education Act or the TEACH Act. This bill outlines the responsibilities higher education has in regards to accessibility and points to the Access Board for the specific standards. Many people have stated that the rules are already in place and this legislation is redundant. However, there are others who would argue that after twenty-five years after the passage of the ADA, higher education has not taken responsibility to ensure that all doors, virtual and otherwise, are open for all people.

K-State using antiquated methods. At this time, Kansas State University is following the antiquated model of providing access to information and communication technology, including course materials. This antiquated model not only places a burden on the student by requiring them to “ask for access,” but it also places a burden on the individual faculty member and department. For example, when a student requests videos to be closed captioned, the faculty member is notified that a request has been made. It is then the responsibility of the faculty member and/or department to provide either the staffing to close caption the videos or pay to have the captioning done by a third-party vendor (at a general cost of \$2 - \$3 a media minute).

The workgroup would like to emphasize that one goal of this process is to create procedures that not only serve students well and provide them the access they need, but just as importantly, provide faculty and administrators the means to provide information and communication technology access. Just as access to the physical campus adheres to the appropriate regulations and is provided by experts hired by the university, so too, access to information and communication technology should be addressed in similar fashion. The workgroup felt that specifically identifying a funding source was out of our purview, but it must be noted that to successfully implement any procedures, funding must be secured and additional staff hired.

The workgroup offers the following outline of a plan to be considered by FSCOT members in the hope that this issue will be given careful consideration, and we thank FSCOT for providing us with the opportunity to serve the greater K-State community.

Attachments:

An Overview from the National Center on Disability and Access to Education

Kansas State University Policies

K-State Accessibility Technologies and Services

A Proposed Corrective Action Plan (with A Proposed ICT Audit at K-State)

Currently Available K-State Accessibility Technologies and Services

Purpose of document: To provide a list of resources currently available.

Resources available through iTAC:

- Accessibility advisement for all faculty who consult on instructional design projects
- Accessibility advisement and support for intensive (funded) instructional design and development projects
 - **Services:** Domain-specific transcription (sometimes within Google's YouTube Video Manager and other times not), styled text files (text reader readable, web screen reader readable), and others
 - **Authoring software tools used with accessibility enablements:** SoftChalk Create 8, Articulate Storyline 2, Articulate Replay, Adobe Captivate, TechSmith's Camtasia, Adobe Creative Suite, Microsoft Office Suite, and others
 - **Cloud-based tools with accessibility enablements:** Scalar (open-source publishing platform), Word Press, Canvas (LMS), Qualtrics (survey and research suite), MediaWiki, and others
- **Equipment:** PDF scanner that enables the creation of "searchable" PDF files readable by screen readers. (at the iTAC Media Development Center)
- **Trainings:** An accessibility aspect for Qualtrics Advanced training, instructional design trainings, Canvas trainings (with instructional designers)

iTAC and Beyond:

- Accessibility webinar hosting / Accessing Higher Ground from Nov. 16 - 20, 2015 (sponsored by iTAC and others on campus)
- Inclusion of Accessibility in "K-State E-Learning Quality Checklist" and the "K-State E-Learning Quality Checklist for Non-Credit Online Learning" (co-developed with Global Campus)
- **Read&Write** is assistive learning software that supports students' literacy needs and is available for all faculty, staff, and students with an eID
- **Mediasite Video Platform** allows for closed captioning of video content in courses.
- **Adobe Acrobat Pro** available to faculty and staff for \$36 a year which allows the saving and converting of PDFs to searchable PDFs readable by screen readers.
- **Content Management System (CMS)** allows for accessible website publishing.

An Overview from the National Center on Disability and Access to Education

Purpose of document: To emphasize the importance of a committed administration in regards to ICT accessibility.

The National Center on Disability and Access to Education (NCDAAE) recommends a four step process for administrators to consider when creating a campus accessibility plan. This is taken from the GOALS Project found at www.ncdae.org.

1. **Commit** – Institutional Vision and Leadership Commitment
 - a. Institution-wide information and communication technology accessibility is best attained and sustained when there is leadership to support the vision and commitment to accessibility.
2. **Implement** – Planning and Implementation
 - a. Web accessibility requires strategic planning. Administrators must establish policies and procedures along with a systematic plan to develop, institute, and maintain information and communication technology accessibility.
3. **Support** – Resources and Support
 - a. Administrators must provide the resources necessary to implement the accessibility plan with provisions to ensure that the system remains accessible.
4. **Assess** – Assessment
 - a. Ongoing assessment is necessary to ensure that the accessibility plan is working and on track.

Kansas State University Policies [Current]

Purpose of document: To provide the current context of K-State's policies in regards to ICT accessibility. In 2001, K-State developed a memorandum outlining the university's responsibility for creating accessible administrative, college, and department web pages in accordance with federal law. At that time, accessible templates were created for campus use.

Since 2001, the utilization of technology has grown exponentially and the university responded by drafting the Course Accessibility Standards Policy. This policy was approved by Faculty Affairs on May 15, 2007 and by Faculty Senate on June 12, 2007. The document cites the State of Kansas Information Technology Policy 1210 and the State of Kansas Web Accessibility Requirements. Under this policy, the responsibility rests with administration, faculty, and staff who are involved in course development and delivery. The Course Accessibility Standards Policy is posted in the Policy and Procedures Manual under General Policies and Procedures 3025 at <http://www.k-state.edu/policies/ppm/3000/3025.html>.

In 2009, work was started on a Web Accessibility Policy which can still be found in draft form at <http://www.k-state.edu/facsen/fscot/2010/documents/K-StatePolicyDraft-websiteaccessibility091509.pdf>. It appears that this policy was trying to address the emergence of new technologies. This [draft] policy focuses attention on the procurement process and states that products provided by third party vendors on behalf of the university or purchased are subject to the same standards.

Recommendations

The workgroup has reviewed both the Course Accessibility Standards Policy and the Web Accessibility [Draft] Policy and feel that these documents provide a foundation to build on. A committee shall be convened to draft an Information and Communication Technology Accessibility Policy which will identify the areas covered by the policy, list the responsible parties, provide a timetable, name the person or department responsible for compliance, and plan for promoting the policy or policies university-wide.

Resources

W3C Strategic Plan - <http://www.w3.org/WAI/impl/>
NCDEA Goals Project - <http://ncdae.org/goals/>
Great Plains ADA Center - <http://www.gpadacenter.org/>
Kansas Partnership for Accessible Technology - <https://oits.ks.gov/kpat/home>

Examples of Accessibility Policy

University of Montana - <https://www.umt.edu/accessibility/implementation/policy/default.php>
Purdue University - <http://www.purdue.edu/policies/information-technology/viic1.html>

Proposed Corrective Action Plan

Purpose of document: To be used as a framework for a corrective action plan.

The proposed corrective action plan will be based on (1) an ICT audit and (2) student survey. Kansas State University should take the following corrective actions--through leadership, professional expertise, and funding--to achieve the following aims.

Information Collection

- Conduct a proposed ICT audit at K-State.
- Develop and conduct a broad-based student survey to understand accessibility needs from the student perspective.

Policy

- Develop and implement policies concerning ICT (information and communication technology).
- The process should be viewed much like IT security on campus. Faculty are not completely responsible as the process takes expertise. PDFs and close captioning should be universally discussed, but technology experts should be in charge of the technical details of the CMS, LMS, and SMS.

Accessible Online Learning

- Create an endorsement tool for online courses (and any courses with online contents) that affirm that the course contents are accessible.
- Provide staffing resources and expertise to ensure that the highest enrollment courses have closed captioned videos, and ensure that there is funding to caption additional videos every semester.

Faculty and Staff Trainings

- Develop and deliver training and information on how to create accessible digital content for all faculty and staff who use online means to deliver course content.

Requirements for Technology Purchases

- Develop and implement procedures that require the university to purchase or recommend only accessible information materials and technologies as part of the RFP process.

Accessible Web Pages

- Official K-State Web pages, as defined in the Internet and World Wide Web Policy Chapter 3440 Section .030, shall be accessible according to WCAG 2.0 AA.
- Set a timeline to ensure that legacy pages meet the same standards as WCAG 2.0 AA.
- Provide an accessibility link in the footer of all K-State webpages which provides the user with a statement of commitment to accessibility by the institution and a means to provide feedback.

Accessibility Oversight

- Establish an institutional system of accessibility oversight by hiring staff member(s) with commensurate authority and create a procedure for monitoring progress campus-wide.

Smart Classrooms and Labs

- Develop and implement specifications to ensure all technologically mediated classrooms and labs are in compliance with applicable requirements for physical accessibility and that all user operated equipment controls and devices are fully accessible.

Awareness and Campus Culture

- Promote accessibility campus-wide with the goal that accessibility becomes a part of K-State's campus culture.
- Infuse accessibility requirements into new positions that will require accessibility work.

Note: The above was partially derived from documentation from University of Montana, Temple University, and University of Tennessee.

Next Steps

With this report, the work of the Workgroup is complete. The next steps should include the creation of a committee to review and if necessary, update policies. Simultaneously, another committee should investigate and make a recommendation on a self-audit vs. a third-party audit. However, even before policies are reviewed or an audit pursued, commitment from top administrators must be established with a funding source identified.

A Proposed ICT Audit at K-State

Purpose of document: To provide a framework for an ICT audit.

As part of a comprehensive strategic plan, an audit is a critical component. Whether the university decides the audit shall be a self-audit or done by a third party vendor, it is important to have a snapshot of what the university is doing right, identify problem areas, discuss possible solution options, assign roles and responsibilities, and provide guidance on a timeframe for the resolution of identified accessibility barriers. The audit shall encompass technology used at the university, college, department and course levels. A sampling of the following forms of technology shall be included.

- * Websites/web pages
- * LMS, CMS, SMS, library databases
- * Documents/forms
- * Instructional materials
- * Media
- * Software and software systems
- * Educational hardware and equipment

A student survey shall also be conducted as another means to identify accessibility barriers. Based on the results of the audit and the student survey, a corrective action plan will be developed and funded. The plan shall list in order of priority the barriers discovered through the survey and audit process, explanation of solutions, responsible parties, and planned completion dates. Training staff, instituting and maintaining a process for reporting barriers, creating a mechanism for assessment, and educating the campus about the need for the plan shall be considered essential components of the corrective action process. This will be an inclusive and participatory process.