

**GRAYS HARBOR COLLEGE**  
**Administrative Procedure**

*Subject: ACCESSIBLE TECHNOLOGY AND ELECTRONIC CONTENT*

*Page 1 of 2*

**Administrative Procedure Number: 805.01**

**Date adopted: Jan 21, 2021**

**Revised:**

**Policy:**

Grays Harbor College is committed to providing equitable access to information, programs, and activities through its electronic content, information technologies, web pages, web-based applications, operating system-based applications, online instructional content, services, and resources for all its constituencies. This policy applies to the development, procurement, and implementation of electronic content and technologies, including websites, hardware, and software, currently in use, or being evaluated for purchase or adoption.

Ensuring equal and effective electronic and information technology access is the responsibility of all college 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, Washington State Core Services RCW 28B.10.910-916; SBCTC Accessible Technology Policy 3.20.30B; Washington State OCIO Policy 188 - Accessibility.

**Procedures:**

Purpose

Grays Harbor College is committed to providing equality of opportunity to persons with disabilities including equal access to college information, programs, services, and activities provided through electronic content and information technology. The college seeks to deploy electronic content and information technology that has been designed, developed, or procured to be accessible to people with disabilities, including those who use assistive technologies. By supporting electronic content and information technology accessibility, the college ensures that as broad a population as possible is able to access, benefit from, and contribute to its electronic programs and services.

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.

"**Disability**" means a physical or mental impairment that substantially limits one or more major life activities.

"**EIT-Based Instructional Materials**" are items that are created, purchased or identified to serve in instruction and communication of information in curricular settings. These items may include, but are not limited to, textbooks in bound, unbound, kit or package form, library media (print, non-print, and electronic resources), instructional software content, web/online content and learning objects, e-books, CD-ROM, DVDS, videos, slides, films, and filmstrips, learning laboratories, recordings, manipulatives, consumables, and ITV content.

"**Electronic and information technology**" or "**EIT**" includes information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information. The term electronic and information technology includes, but is not limited to, the internet and intranet websites, content delivered in digital form,

electronic books and electronic book reading systems, search engines and databases, learning management systems, classroom technology and multimedia, personal response systems ("clickers"), and office equipment such as classroom podiums, copiers and fax machines. It also includes any equipment or interconnected system or subsystem of equipment that is used in the automatic acquisition, creation, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. This term includes telecommunication products (such as telephones), information kiosks, Automated Teller Machines (ATMs) transaction machines, computers, ancillary equipment, software, firmware and similar procedures, services (including support services), and related resources.

**“Equally effective”** means that the alternative format or medium communicates the same information in as timely a fashion as does the original format or medium.

**“Legacy websites”** are College Program and Department websites published before *June 30, 2017*.

**“Legacy courses”** are online college courses published before the effective date of this policy and procedure.

**“Repeat courses”** are college courses which have been taught repeatedly (i.e., more than once) by the same instructor.

### Scope

These procedures apply to:

- All electronic instructional materials (syllabi, textbooks, presentations, handouts, etc.). This includes electronic instructional materials delivered within the college’s learning management system, in face-to-face classes, or in an alternate fashion (email, blogs, etc.) and electronic instructional activities (online collaborative writing, web conferencing, etc.).
- All college web pages and programs used to conduct college business and activities including web resources used in courses.
- All college-produced and maintained or distributed electronic documents. Electronic documents include, but are not limited to, word processing documents, PDFs, presentations, publications and spreadsheets which are scanned, uploaded, posted, or otherwise published or distributed electronically. Legacy documents must be made accessible when used or upon request.
- All media resources used in college programs and activities must be accessible. For example, this includes, but is not limited to, media that is instructional, informational, marketing, and promotional.
- All college purchases of Electronic and Information Technology (EIT) software, hardware and services.
- Physical textbooks are outside the scope of electronic and information technology accessibility.

### Standards

All instructional materials must meet all applicable standards and guidelines outlined in this policy. Electronic content must be as effective and usable for persons with disabilities as it is for persons without disabilities.

All electronic instructional materials, optional and required, will be accessible. Instructional materials and activities will be made available to all students at the same time.

Electronic documents must be accessible. Electronic documents must meet the standards and guidelines outlined in the [Guidance on Applying WCAG 2.2](#).

Video media resources will be closed captioned and audio-described and audio resources will be transcribed.

All web pages, websites and web-based software published, hosted or used (including remotely hosted sites and software) by the college will meet the standards and guidelines outlined in the Web Content Accessibility Guidelines (WCAG) 2.2 (<https://www.w3.org/TR/WCAG22/>) published by the W3C as follows. All pages will meet Level AA guidelines with limited exceptions outlined at Exhibit A. All college websites, unless technically impossible, will link to the college's main accessibility page which includes a statement of commitment to web accessibility.

All departments will purchase and produce only accessible multimedia and update existing inaccessible media as it is put into use. Contracts and procurement processes for EIT must include the following clause:

“Contractor acknowledges that no college funds may be expended for the purchase of information technology equipment and software for use by employees, program participants, or members of the public unless it provides blind or visually impaired individuals with access, including interactive use of the equipment and services, that is equivalent to that provided to individuals who are not blind or visually impaired. In addition, Contractor acknowledges that such information technology equipment and software will provide equal and effective access to all individuals in accordance with federal and state laws and regulations, including, but not limited to the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, and Section 508 of the 1973 Rehabilitation Act.”

All software, hardware and systems purchased must be accessible and must produce accessible products. Accessible, in this context, means compatible with assistive technology. Examples of software, hardware and systems include, but are not limited to, learning and content management systems, library and email systems, and administrative management systems such as finance, registration and human resources, and all software, hardware and software services used for student services. Software includes freeware, shareware, desktop, enterprise, subscription and remotely-hosted options. Software that is accessed through a web-browser must also be accessible and is discussed under Section 1 of these procedures.

## **Implementation Plan:**

### **1. All Departments, Programs, and Employees**

#### **1.1 Responsibilities**

##### ***All Departments, Programs, and College Employees:***

- Will follow the accessibility requirements outlined in these procedures when creating and using digital content.
- Will ensure that online activities are hosted in accessible environments and that online content follows standards outlined by this policy.
- Will ensure that instructional materials comply with all requirements outlined in these procedures.
- Must purchase or otherwise acquire accessible EIT, in accordance with these procedures.

- Will ensure that their software, hardware, local interfaces and modifications and electronic systems are accessible.
- Will provide accessible document instruction and support for campus community members.
- Will ensure that departmentally owned classrooms use and deliver accessible electronic and information technology.
- Will ensure that all other media that will be used on the web or in instruction is captioned.
- Will purchase only captioned versions of audiovisual media whenever possible.
- Will purchase only transcribed audio and audio-described versions of audiovisual media whenever possible.
- Will update any non-transcribed audio and any non-captioned/non-described video that is in current use.
- Will use only transcribed audio and closed-captioned media with audio-descriptions that are made available in a timely manner to the class and will only assign such media as course material, whether optional or required.

### **1.2 Implementation Schedule Summary**

- By *[7/1/2018]* the college will develop and institute procedures that require the college to purchase or recommend only EITs that will provide the same programs, benefits, and services as they do to individuals without disabilities, except when it would fundamentally alter a program or when it is not technically feasible to do so, in which case the procedures will require the college to provide accessible alternate EITs.
- By *[8/1/2020]*, the college will identify its strategy to ensure the ongoing accessibility of its learning management systems, instructional technologies, and instructional materials.
- By the start of *[8/1/2021]*: Develop a strategy for review of academic and other hardware with the intent that only hardware with accessible options should be selected for use in academic courses and campus activities including such things as door swipes and educational technology.
- By *[8/1/2021]*: Explore funding options and develop a financial plan for the payment of necessary accessibility services such as captioning, audio description, training, etc.

By January 1, 2019, the college will implement as part of its request for proposal process a requirement that bidders meet the accessibility standards of WCAG 2.2 Level AA for web-based technology (as set forth in Appendix A to this Agreement) and Section 508 of the Rehabilitation Act and the Americans with Disabilities Act for other EITs; and requiring or encouraging, at the college's discretion, as part of any contract with its vendors, provisions in which the vendor warrants that any technology provided complies with these standards and any applicable current federal and state disability laws. Is this done?

## **2. Faculty**

### **2.1 Responsibilities**

#### ***Faculty:***

- Will select, create and present accessible courses and instructional materials using WCAG 2.2 aligned guidelines found at [GHC Course Accessibility Guidelines](#).
- Will improve accessibility of courses which the instructor has previously taught to comply with best practices and exemplary accessibility standards outlined in GHC accessibility guidelines

- Will select electronic texts and/or open education resources (OER) that comply with GHC accessibility guidelines and/or are otherwise ADA compliant.

## 2.2 Implementation Schedule Summary

- **By 9/15/2021: New Courses and new instructional materials on the web will be accessible according to [GHC Course Accessibility Guidelines essential standards](#).**
- **By 9/15/2021: All new videos (professionally or internally produced) used in courses and shared on campus websites or video storage sites (such as YouTube and Vimeo, etc.) will be captioned.**
- **By 9/15/2021: Research acceptable practices and alternatives for accessible scientific and mathematical documents and 2) accessible documents from campus publications, etc.**
- **Starting 9/15/2021: Develop strategies to address identified accessibility needs by either producing accessible scientific and mathematical documents and documents from publications or documenting alternative procedures for accessible scientific and mathematical documents.**
- **By 9/15/2022: Courses and instructional materials in courses which the instructor has previously taught will be continuously updated to reflect best practices and exemplary accessibility standards according to GHC accessibility guidelines.**

## 3. eLearning Office

### 3.1 Responsibilities

#### *eLearning:*

- Will provide up to date guidance for faculty and instructional staff on current compliance.
- Will provide professional development and training opportunities for selecting and creating accessible instructional materials and content.
- Will develop and publish GHC Course Accessibility Guidelines in compliance with WCAG 2.2 or most current recommendations for faculty, to conform with accessibility requirements.
- Will provide instruction and support for campus community members creating online courses and online instructional content.
- Will facilitate hosting of online activities in an accessible learning management system and related hosted systems (such as web conferencing) that are accessible.
- Will develop and train faculty on a process and guidelines for captioning instructional videos
- Will incorporate captioning and media accessibility information into training.
- Will coordinate campus-wide captioning and transcribing solutions that:
  - Aid with obtaining permission to caption and audio-describe.
  - Disseminate information to the college community about college protocols related to accessible electronic media including a list of approved vendors to perform captioning.

### 3.2 Implementation Schedule Summary

- **By 8/1/2019:** Accessible technology professional development and training opportunities will be available to all faculty.

- By **5/1/2020**: Will establish a college process for the creation and captioning of accessible media.
- By **5/1/2020**: Will have available training resources for faculty to support the creation and captioning of accessible media.
- By **7/1/2021**: Will have established a practice of identifying and supporting faculty who require additional assistance with maintaining accessible online course materials.

## **4. Accessibility Services**

### **4.1 Responsibilities**

The Associate Director of AccessAbility and Veterans Services will:

- Provide guidance to the Accessible Technology Work Group to ensure that procedural compliance continues to align to best practices
- Coordinate with the bookstore to ensure that reading systems and software for textbook delivery proactively adheres to accessibility laws and guidelines
- Establish processes that allow students to make accommodation requests for appropriate EIT and for the college to fulfill said requests

### **4.2 Implementation Schedule Summary**

- By **8/1/2020**: Students may request that recordings of course sessions and presentations created for and during a course, and in use only during that course, be captioned.
- By **8/1/2020**: Assess Audio Description availability and create a plan toward audio description standards and for use on campus. Audio Description videos will be acquired and created when technology permits.
- By **8/1/2021**: Reading systems and software that are used for textbook delivery should conform to Daisy Consortium guidelines: <https://inclusivepublishing.org/toolbox/accessibility-guidelines/>

## **5. Library**

### **5.1 Responsibilities**

*Library:*

- Will maintain an accessible website and implement an accessible search engine.
- The Library will implement procedures for ensuring that materials digitized or hosted by the library for research purposes are accessible to individuals with disabilities.
- Will assist faculty to identify materials that are captioned prior to purchase.

### **5.2 Implementation Schedule Summary**

- By July 1, 2021, the Library will implement a discovery tool that is accessible in accordance with WCAG **2.2** Level AA standard, as set forth in Appendix A to this Agreement.
- By July 1, 2021, the college's library website will be accessible in accordance with WCAG **2.2** Level AA standard, as set forth in Appendix A.

## **6. Communications and Public Information**

### **6.1 Responsibilities**

#### ***Communications/Public Information:***

- Will produce only new communications and promotional materials that are captioned, audio-described or transcribed.
- Will ensure that all applications developed on campus (web, desktop, etc.) are accessible according to principles of WCAG 2.2 AA level, WAI-Aria 1.0, and ATAG 2.0 standards (extrapolated as needed for non-web environments). Will ensure that any Content Management System and other web production or web object creation software proposed and supported by central IT will be accessible and will produce accessible web pages.

### **6.2 Implementation Schedule Summary**

- By ***April 30, 2017***, the college will identify a strategy to ensure that webpages that provide essential student functions are accessible.
- By ***April 30, 2017***, all college Program and Department websites, including legacy pages, unless technically impossible, will contain a clear statement (or a link to a statement) describing the College's commitment to web accessibility and a method to report barriers and/or to receive an alternative equally effective accessible format.
- By ***June 30, 2017***, all webpages published or hosted by the college on or after ***June 30, 2017***, will be accessible according to WCAG 2.2 Level AA standard.
- Upon a specific request for access by an individual with a disability, the college will update legacy pages to be in compliance with the WCAG 2.2 Level AA standard, as set forth in Appendix A to this Agreement, or the college will otherwise make the content available to the individual in a timely manner and in an equally effective accessible format.

## **7. Information Technology (IT)**

### **7.1 Responsibilities**

#### ***IT:***

- Will provide instruction and support for campus community members creating college websites and content so that individuals who author web content can be trained according to these standards.
- Will ensure that all departmental computer labs provided for student use will have assistive technologies not limited too but including accessible computer stations, screen reading software, and screen magnification.
- Will ensure all classroom and presentation equipment is caption-compatible and the default on all TVs, etc.
- Will maintain and continue to provide instructions on media accessibility (such as captioning and audio-describing media and transcribing audio) as well as how to show captioned media in classrooms.
- Will incorporate into faculty training on AV equipment information about accessibility.
- Will use only accessible electronic and information technology in IT-designed and supported classrooms.

- Will serve as a clearing house for information about assistive technology and modifications recommended for departmental computer labs.
- Will ensure that assistive technologies are immediately available to students working in campus labs or on publicly accessed campus computers.
- Will ensure that assistive technologies are available in a timely manner for campus employees including student employees.

***IT Accessibility Coordinator & Accessible Technology Work Group:***

- Will coordinate campus processes for ensuring campus software, hardware and software system accessibility.
- Will coordinate instruction and support for campus community members creating college websites and content so that individuals who author web content will do so in accordance with WCAG 2 Guidelines AA Standards.
- Will compile and maintain data to track compliance with the policy and procedures and make recommendations for addressing problems.
- Will work with IT, AAS, Library, and eLearning to coordinate PDF solutions.
- Will serve as a resource for EIT purchases and other acquisitions for compliance with accessibility requirements.
- Will provide written justification for all provisional use waivers.

**7.2 Implementation Schedule Summary**

- By April 30, 2017: The college will implement a program to provide information, education, and support for ensuring that EIT used in classrooms (including, but not limited to, clickers, podiums, blogs, and other software) is accessible.
- By April 30, 2017: Campus computer labs will meet Accessible Technology Work Group recommended installations and procedures.

***Exceptions***

Conformance to standards may not always be feasible due to the nature of the content, the purpose of the resource, the lack of accessible solutions, or an unreasonably high administrative or financial cost necessary to make the resource accessible.

1. The following circumstances may qualify as exceptions from this policy: Where compliance is not technically possible or may require extraordinary measures due to the nature or intent of the information resource, application, or service.
2. Where compliance would result in a fundamental alteration of the information resource, application, or service, and not satisfy the original intent.
3. Where, in the case that information resources, applications and services that are procured through third party vendors or contractors; and that no alternative accessible products are available from other third-party vendors or contractors, procurement can be made of a non-compliant product.
4. Where the product is not currently in compliance, but efforts are underway to fix the defects by a defined date.

***Related Information***

[Americans with Disabilities Act](#) of 1990 Accessibility Requirements  
[Americans with Disabilities Act Section 504](#) of the Rehabilitation Act of 1973



[Americans with Disabilities Act Section 508](#), Rehabilitation Act of 1998

[Washington State Office of the Chief Information Officer Policy 188](#) - Accessibility

[Washington State Board for Community and Technical Colleges](#) - Accessible Technology 3.20.30b

[Web Accessibility Initiative \(WAI\)](#)

[Web Content Accessibility Guidelines \(CWAG\) 2.2](#)

[World Wide Web Consortium \(W3C\)](#)

## **Appendix A: AA Standards**

- 1.2– Time -based Media
  - 1.2.4 Captions 1.2.4 Captions are provided for all live audio content in synchronized media.
  - 1.2.5 Audio description is provided for all prerecorded video content in synchronized media.
- 1.4 – Distinguishable
  - 1.4.3 The visual presentation of text and images of text has a contrast ratio of at least 4.5:1, except for the following:
    - Large Text: Large-scale text and images of large-scale text have a contrast ratio of at least 3:1;
    - Incidental: Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement.
    - Logotypes: Text that is part of a logo or brand name has no minimum contrast requirement.
- 2.4 – Navigable
  - 2.4.6 Headings and labels describe topic or purpose.
  - 2.4.7 Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible.
- 3.2 – Predictable
  - 3.2.3 Navigational mechanisms that are repeated on multiple Web pages within a set of Web pages occur in the same relative order each time they are repeated, unless a change is initiated by the user.
  - 3.2.4 Components that have the same functionality within a set of Web pages are identified consistently.
- 3.3 – Input Assistance
  - 3.3.4 For Web pages that cause legal commitments or financial transactions for the user to occur, that modify or delete user-controllable data in data storage systems, or that submit user test responses, at least one of the following is true:
    - Reversible: Submissions are reversible.
    - Checked: Data entered by the user is checked for input errors and the user is provided an opportunity to correct them.

## **Appendix B: EITA Software Accessibility & Procurement**

### **STEP 1 – IDENTIFICATION**

- There will be a step in WEBS, (that includes the sole source and bid processes) that requests a local count.
  - All software purchased should be accessible.
  - Existing software will be highlighted and researched during the self-study

**STEP 2 – EVALUATION**

Qualified staff will request and review VPATs, check with vendors about planned accessibility fixes and indicate those fixes or possible technical adjustments for non-fully supported categories. If neither fixes nor technical adjustments can be made, general accommodations (recommended by the ADS office) will be listed.

1. If all VPAT “applicable categories” are marked “fully accessible,” software (with date and version number) will be sent to step 3 with supporting information and a recommendation for purchase.
2. If all VPAT “applicable” categories are not marked fully supported, software (with date and version number) will be sent to step 3 with supporting information and a recommendation regarding the purchase.

**STEP 3 – DETERMINATION**

1. Compiled information and report are created and reviewed by the Accessible Technology software/procurement group for recommendations.
2. EITA recommendations are submitted to the Chief Executive of Information Technology (CEIT) for final determination of “provisional use” or “exception.”
  - a. “Provisional Use” agreements are recommended for 1-3 year period, if the vendor provides evidence of genuine accessibility efforts, and periodically reviewed.
  - b. “Exceptions” are infrequently, based on substantial research as indicated above
3. If either a provisional use or exception is granted, the requestor will be required to describe the measure(s) which will ensure that individuals with disabilities have equally effective accessible alternate EIT.

**STEP 4 – REPORTS**

Once a determination has been made by the CEIT, the EITA will designate software as “approved” for purchase, granted “provisional use,” granted an “exception,” or “denied.” The name of the software, vendor, version, and date will be included in the designation.

The report on purchase will be made available on the Accessibility site along with:

- Name of the department, date, determination, and date of the provisional use period – if appropriate
- Name of software program, version and date reviewed
- VPAT (if publicly available on the vendor’s website)

**STEP 5 – REVIEW**

Provisional use designations are temporary. A “provisional use” designation does not automatically roll into “approved for purchase” category. Their status should be reviewed by the Accessible Technology Work Group at the end of the agreement period.

**Appendix C: Software Categories and 508 vs. WCAG standards**

VPATs largely reflect Section 508 standards. Section 508 1194.21 refers to Software Applications and Operating Systems and Section 508 1194.22 refers to Web-based Internet information and applications. WCAG 2.2 can be mapped to Section 508 1194.22 and Section 508 1194.21 can reflect the functionality required to meet WCAG 2.2 AA.

***Standards***

VPATs will be required for all software purchases because they are the commonly accepted standard for assessing software accessibility and because they provide information related to both Section 508 and WCAG 2.2.

***Desktop and Enterprise software***

Desktop and Enterprise software that is purchased, stored and maintained on local servers is addressed by Section 508 1194.21 (and that section of the VPAT). Such software is usually licensed and locally maintained. However, such software should match WCAG 2.2 AA functionality and should meet WCAG 2.2 AA standards (as initially analyzed through VPATs Section 508 1194.22) if:

- its products are shared on the web.
- its functionality is provided via web browser or internet connection.

***Web-based software***

Software that has a web or internet component is evaluated by WCAG 2.2 AA standards (as initially reflected through VPAT's 1194.22 section) and applies to:

- SaaS (Software as a Service) –functions that are provided by vendors, accessed via the internet, hard to customize, often purchased through monthly and service fees.
- Site – final product (pages) and functionality