Web Accessibility Policy: Standards and Practices

PURPOSE:

Information Technology Resources Responsible Use Policy – Section E.11 provides the policy basis for Cal Poly's Web Accessibility standards and practices.

Cal Poly is committed to ensuring accessibility of its Web-based content, applications, and services for persons with disabilities in accordance with existing policies and laws.

The following document outlines the minimum campus requirements for ensuring compliance with the California State University Accessible Technology Initiative; describes expectations regarding roles and responsibilities; establishes timelines for achieving compliance; and provides links to resources to assist the campus community in creating and maintaining accessible online content.

APPLICATION:

These standards apply to Web-based content, applications and services created and maintained by the University and by others on behalf of the University.

All new or revised Web pages, Web-based applications/services and digital content published or hosted by the University must comply with these standards.

These standards are subject to review and may be modified to reflect changes in technology or California State University (CSU) or Federal guidelines for compliance as needed. The campus community will be notified of changes and new timelines for compliance will be established.

STANDARDS (MINIMUM REQUIREMENTS):

1. To be compliant with CSU policy, all new, updated and existing Cal Poly Web pages, Web-based applications and services, and University-related digital content delivered via the Web must conform to the Section 508 of the Rehabilitation Act standards for Web-based Intranet and Internet Information Applications based on established timelines.

2. As of September 1, 2007, all new and significantly redesigned University Web pages must conform to CSU best practices for web development. A revision is defined as a significant redesign or major revision of a University Web page, application or content.

3. Each University Web site must contain an accessible link or a person to contact if users have trouble accessing content within the site. This would usually be the Web site manager or the main department contact number.

4. Reasonable effort must be taken to ensure that pre-existing (legacy) Web pages, Web-based applications and services, and digital content comply with these standards within established campus timelines. This provision applies to content published before September 1, 2007.

5. Upon specific request, information on legacy Web pages is to be made available to any individual needing access to such content, by revision or otherwise. The unit or individual responsible for the information on the Web is responsible for providing that access.

6. Upon specific request, information on Web sites and Web pages in archive status (i.e., no longer in use but subject to records retention plans and containing core administrative or academic information, official records, and similar information) is to be made available to any

individual needing access to such content, by revision or otherwise. The unit or individual responsible for the information on the Web is responsible for providing that access.

7. Cal Poly will use standard tools and practices adopted by the California State University system to evaluate and test campus Web sites for compliance with these standards. Campus units will be required to use established practices to evaluate, test and report on compliance.

8. Only campus Web sites certified as meeting these standards can be included in the A-Z index and main pages in the Cal Poly Home Page.

9. A template meeting current standards for accessibility and best practices is available to the campus community to facilitate and encourage compliance with these standards.

10. Training, consulting and software tools are available to the campus community to create and maintain compliant Web sites and content and to identify and repair non-compliant issues.

11. Online content created and/or maintained by an external, third-party or non-University source must be accessible if the content is required for a Cal Poly course, function or service.

EXCEPTIONS:

Where compliance is not possible, exceptions may be granted by the Vice Provost/Chief Information Officer (VP/CIO) based on applicable policies and laws and established practices. Requests for exceptions must be accompanied by a proposed plan for achieving compliance within a specified timeframe and/or a plan for providing the information in an alternative format that ensures equally effective access to the information by persons with disabilities.

ROLES AND RESPONSIBILITIES:

1. Campus Web site managers are responsible for ensuring accessibility compliancy, design and maintenance of Web pages, web-based applications and services, and electronic content for their respective academic, administrative or auxiliary units. They are responsible for ensuring that these meet established standards using available tools and resources. This includes content they personally create or content they maintain on behalf of others.

2. Faculty members are responsible for ensuring accessibility compliancy, design and maintenance of instructional materials delivered electronically based on timelines established in the Cal Poly's ATI Instructional Materials Plan. This includes Web sites they personally create or maintain and instructional materials provided electronically to students on their behalf, regardless of where those materials reside. They are responsible for ensuring that these meet established standards using available tools and resources.

3. Campus administrators are responsible for overseeing accessibility compliance for their respective academic, administrative or auxiliary units. This includes:

   a. designating a Web accessibility coordinator (as defined below) and ensuring that the position description for that individual accurately reflects the associated duties and responsibilities; skills, knowledge and abilities; and level of authority
   b. identifying all Web sites and Web-based applications, services and content over which they have authority
   c. establishing priorities and timelines for achieving compliance of the items in 3.b
   d. assigning the necessary resources to review, develop, repair and maintain accessible Web sites and content

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       e.   ensuring staff and faculty receive appropriate training and support
       f.   monitoring progress towards compliance by individuals and departments
       g.   certifying compliance using established campus practices
       h.   requesting exceptions and documenting plans and methods for providing equally effective access to information that is currently non-compliant
       i.   ensuring Web-based content, applications and services developed and/or hosted by third-party vendors on behalf of the University comply with campus standards

4. At the direction of their campus administrator (as defined above), the Web accessibility coordinator is responsible for coordinating and ensuring accessibility compliance of Web pages, Web-based applications and services and electronic content for their respective academic, administrative or auxiliary unit. The Web accessibility coordinator must have sufficient web development expertise and knowledge of accessibility standards and requirements to train and consult with individuals in their area on what is required to be compliant, and to monitor and report on unit progress towards achieving compliance. Given the level of responsibility and expertise required for this function, the Web accessibility coordinator must be an employee but not a student assistant.

5. Information Technology Services is responsible for training and supporting campus Web accessibility coordinators and facilitating training and support to campus web site managers and developers. This includes providing access to and support for the tools and resources necessary to create and maintain compliant Web sites and electronic content and to identify and repair non-compliant issues. Examples include online documentation, step-by-step process guides, templates, consultation, and referrals to available training and resources.

6. Information Technology Services is responsible for establishing overall timelines for campus compliance. ITS will work with the campus administrator and Web accessibility coordinator to establish plans and timelines for ensuring compliance of Web sites, applications and services within their respective administrative, academic and auxiliary units.

7. Information Technology Services will periodically assess and report to campus administrators and Web accessibility coordinators regarding their progress towards achieving compliance based on unit plans and timelines.

8. Information Technology Services will use automated tools to measure compliance of specific sites. Other measures of progress may include numbers of individuals trained, numbers of sites listed as non-compliant, length of time sites have been listed as non-compliant, etc.

9. Information Technology Services will conduct routine periodic reviews of campus Web sites. Any unit with non-conforming sites will be asked to correct any problems within a specified timeframe. Notices of non-compliance will be sent to the Web accessibility coordinator. Failure to remediate non-compliant sites may result in temporary removal of network access or other action until such time as the site is verified as compliant, a plan for achieving compliance is approved, or an exception to these standards is granted.

10. Information Technology Services will review, approve, document and monitor exceptions.

11. Information Technology Services will review new Web-based applications and services for compliance with accessibility requirements prior to purchase and/or development.

12. The Disability Access and Compliance Committee (DACC) is responsible for reporting to the President and CSU Chancellor's Office on overall campus progress towards compliance with Executive Order 926. To that end, the committee may periodically request and review reports

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from Information Technology Services or other functional units on actions being taken and planned, issues and concerns, and progress made to achieve compliance.

13. ITS and the DACC are responsible for educating and informing the campus community about this policy and related standards and practices based on established communication plans. This includes establishing a consolidated accessibility Web site for collecting and sharing information; issuing regular announcements to the campus community via email, Cal Poly Report, My Cal Poly Portal, etc.; making presentations and progress reports to Management Staff, Academic Senate, campus computing committees and other governance bodies.

TIMELINES AND MILESTONES:

DATE	ACTION	WHO
June 15, 2007	Campus Web Accessibility Plan and First Year Project Report submitted to CSU Chancellor's Office	ITS Office of the CIO
Sept. 1, 2007, ongoing	All new and significantly redesigned Web sites, applications/services and Web-based content must be compliant or documented as an exception	Campus Community
Sept. 1, 2007	Notify campus administrators regarding their roles and responsibilities and request written plans and priorities by November 1, 2007	ITS Office of the CIO Provost DACC
Nov. 1, 2007	Submit written plans and priorities: designate unit coordinator, identify and prioritize existing sites for repair/replacement, identify applications/services	Colleges, Divisions, Departments
Jan. 1, 2008	Primary University Web sites must be compliant, e.g., sites identified in the First Year Pilot Project or have plan in place to be compliant by 2009	Colleges, Divisions, Departments
Jan. 1, 2008	Web-based applications and services hosted by Cal Poly or on behalf of Cal Poly must be certified as compliant, documented as exceptions or have a plan in place to be compliant by 2012, e.g., replacement	Sponsoring University Department, Vendor.
June 1, 2008	Secondary University Web sites must be compliant in accordance with division/college/department plan	Colleges, Divisions, Departments
June 15, 2008	Progress Report on Campus Implementation Plan submitted to CSU Chancellor's Office	ITS Office of the CIO DACC
June 1, 2009	Tertiary University Web sites must be compliant in accordance with division/college/department plan	Colleges, Divisions, Departments
June 1, 2009	Auxiliary Web sites must be compliant, documented as exceptions, or have a plan in place to be compliant by 2012	Campus Auxiliaries
June 15, 2009	Progress Report on Campus Implementation Plan submitted to CSU Chancellor's Office	ITS Office of the CIO DACC
June 1, 2010	Non-Core University-hosted Web sites, e.g., student clubs, must be compliant, documented as exceptions or have a plan in place to be compliant by 2012	Student Clubs, IRAs, Institutes, etc.
June 15, 2010	Progress Report on Campus Implementation Plan submitted to CSU Chancellor's Office	ITS Office of the CIO
June 1, 2012	All university Web sites, applications/services and Web-based content must be compliant	Campus Community
June 1, 2012	Individual faculty Web sites and all instructional content delivered electronically must be compliant	Faculty, Departments, Colleges

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TOOLS AND RESOURCES:

1. [Campus Accessibility Website](#) contains links to information about training, consulting, tools, step-by-step guides and other resources related to Web accessibility policies and practices

2. [Section 508 of the Rehabilitation Act Standards for Web-based Intranet and Internet Information Applications](#)

3. Web Page Accessibility Testing Tools – Cal Poly will use Hi-Software AccMonitor, AccRepair, [Section 508 manual evaluation tools](#), and the [CSU Manual Evaluation Process](#) to evaluate campus Web sites for accessibility compliance

4. [ADA Web Check Results](#) – Links to AccMonitor reports for evaluated Cal Poly Web sites

5. [Web Authoring Resource Center (WARC)](#) provides developers with the information and tools necessary to plan and build a site that meets basic requirements for University identity, Web accessibility, usability and aesthetics

6. [Tips and Tutorials for Creating Accessible Content](#) – CSU Web site with links to resources to assist users in creating accessible PDF, Word, Flash and other types of Web-based content

7. [CSU Accessible Technology Initiative – Web Accessibility FAQs](#)

REFERENCES:

1. [The CSU Board of Trustees Policy on Disability Support and Accommodations (Executive Order 926)](#)
2. [Coded Memorandum AA-2006-41: Access to Electronic and Information Technology for Persons with Disabilities](#)
3. [Coded Memorandum AA-2007-04: Access to Electronic and Information Technology for Persons with Disabilities](#)
4. [AA2007-13: Accessible Technology Initiative: Changes to Planned Submission Dates for Procurement and Instructional Materials – Compare Coded Memorandum AA-2007-04](#)
5. [Cal Poly's Information Technology Resources Responsible Use Policy](#)
6. [Section 508 – Electronic and Information Technology](#)