Fort Lewis College Standards for the Accessibility of Information and Communication Technology

Approved by Informational Technology & Digital Accessibility Review Committee on 03/23/18.

A. Introduction

This document establishes the official Fort Lewis College standards for the Accessibility of Information Technology and Digital Content, in accordance with, and as a supplement to, the Fort Lewis College Accessibility of Information Technology and Digital Content Policy.

B. Statement of Purpose

Fort Lewis College is morally and ethically committed to communicating information to all individuals in a manner that enables them to achieve their academic and professional goals and aspirations. To achieve the commitment of maintaining accessibility in a digital environment, Fort Lewis College has established an Information Technology and Digital Accessibility Policy.

C. Scope

This document is to ensure that all Information Technology and Digital Content created, purchased or used to carry out any program, service or activity for Fort Lewis College is accessible, with or without a reasonable accommodation, except when an exception has been granted. These standards apply to all Fort Lewis College departments, centers, offices and authorized organizations and apply to content created on behalf of these units, including from in-house or by external entities.

These standards apply to all digital technology used to conduct college business, except digital technology created or published by students, faculty, or staff for personal use. When student content is created in an academic context and shared for peer review, faculty must be prepared to provide accommodation.
These standards are intended to comply with the equal opportunity requirements of federal and state laws that apply to Fort Lewis College, including, but not limited to Section 504 of the Rehabilitation Act of 1973, as amended, Americans with Disabilities Act of 1990, as amended, and the Higher Education Opportunity Act. The standards are also informed by other sources that address digital technology specifically.

D. Best Practice Standards

Faculty or staff needing support or guidance when implementing these standards should contact Teaching and Learning Services

jrider@fortlewis.edu or Jacobsen_C@fortlewis.edu

Faculty should refer to the Course Syllabus Policy and download the ADA Compliant Course Syllabus Template.

1. Syllabus: In order for students to have notice of their rights and responsibilities, and according to the policy, faculty and instructors must include a statement regarding reasonable accommodations in their course syllabus. The following is a template that faculty and instructors will use:

"Fort Lewis College is committed to providing all students a liberal arts education through a personalized learning environment. If you think you have or you do have a documented disability which will need reasonable academic accommodations, and/or if you are a Veteran who may need services, please contact the Disability Services Office, 280 Noble Hall, 970-247-7383, disabilityservices@fortlewis.edu for an appointment as soon as possible."

2. Course Materials & Textbooks: Students with print-related disabilities can request their textbooks and instructional materials (including electronic content and services) in an alternate format from Disability Services to ensure equal access at the same time as all students registered in a course. It is important to note that production of alternate formats can be time-intensive. Many files can be provided within two weeks; however other files may take as long as four months to procure and format for use. In keeping with the spirit of the Accessibility of Information Technology and Digital Content policy, faculty should give preference to course materials with an alternate format available.
The Higher Education Opportunity Act (HEOA) requirements stipulate that book lists are, to the extent practically possible, provided to the student at time of registration. Per HEOA requirements, faculty are responsible for providing book lists to the Campus Bookstore in advance of registration. In the case of classes with large sections or classes taught by non-tenure track faculty, it is the responsibility of the department to ensure the book lists are provided to the Campus Bookstore. The academic department chair or chair of the departmental curriculum review committee is accountable for ensuring the bookstore receives book lists. To assist departments in the responsibilities, the bookstore will provide the chair or their designee a listing of courses for which materials have not been adopted.

The Campus Bookstore Manager shall establish a process to ensure booklists are provided to students in advance of registration when feasible. The Campus Bookstore shall publish preferred publishers that provide textbooks with alternate format. Faculty may not enter into contracts on behalf of the College for course materials and should consult with the Campus Bookstore for such agreements.

Alternate formats of materials for students must be provided at the same time that the student at large is able to access the material through regular means. Providing required textbooks and supplemental reading material lists at the time of registration ensures that students have adequate time to partner with Disability Services to ensure materials are completed prior to the first course meeting.

3. Websites: As of 11/1/2017 the main Fort Lewis College website is undergoing a major refresh project. The project will, to the fullest extent feasible, comply with Web Content Accessibility Guidelines 2.0 as defined by the Web Accessibility Initiative. The Office of Marketing and Communications is responsible for the FLC website and will enforce compliance with this policy. Departments that host their websites with subdomains are responsible for ensuring their site complies with FLC accessibility standards.

Before purchasing software or implementing websites that are not hosted by Fort Lewis College, the vendor must provide a VPAT, Voluntary Product Accessibility Template. The VPAT must be approved by the IT Director before purchase. (See Software Purchasing Policy)

Mobile applications should also conform to Web Content Accessibility Guidelines 2.0 and provide a VPAT for approval before purchasing and making available to students, faculty, staff or the public.
4. Closed-Captioning and Audio Description of Audio-Visual Materials (e.g., YouTube, or MP4 files): Individuals with hearing impairments may require closed captioning in order to access the audio component of video media, and individuals with visual impairments may require audio description in order to access video content. Reasonable accommodations for closed-captioning and audio description for students, faculty and staff must be provided at the same time that the multimedia is shown to the class or audience. All video media material used for participation in a course must be captioned and/or described. If providing the captioned or audio-described version at the same time is problematic, the video media shall not be used and alternate accessible materials may be substituted.

Required closed-captioning or audio-describing must ensure the following:

- **Accuracy** (spell all the words right; deep or technical content may require a specialist to perform captioning)
- **Synchronicity** (the captions do not lag or race ahead of the dialogue)
- **Completeness** (everything gets captioned and captions do not use shorthand or are truncated unless necessary)
- **Placement** (captions do not obscure visual material on screen and, where possible, help convey soundstage and positioning—e.g., putting the captions on the left and right side of the screen to distinguish between two speakers).

Faculty will arrange for all video course materials to be captioned if they are not already. Resources for closed-captioning can be found either in the automated transcribing & captioning features to a video hosting solution’s integration into the college’s learning management system or provided by the college’s Information Technology Department. If the video hosting service exists, auto transcription & captioning provided by a video hosting solution’s integration into the college’s learning management system can assist with accommodation requests. If not, a captioning request can be made with the college’s Information Technology Department by creating a service request ticket. Attempts to secure permission from the copyright owner will be made but will not delay the accommodation.

The college’s Information Technology Department shall close-caption non-course related academic content when the Provost or appropriate dean determines that the content is strategic to the campus mission. Faculty seeking grants for educational or outreach activities must include costs for closed-captioning.
Additionally, departments have a responsibility to ensure closed-captioning is available on materials related to their program and/or service for which access is unrestricted (e.g., video content available to the general public). Official video media content that represents the university and to which access is unrestricted must be captioned.

All departments, programs, instructors and employees are required to purchase only captioned versions of audio-visual media whenever possible. Audio-described versions of audio-visual media are also recommended for purchase. In general, any non-transcribed audio and any non-captioned/non-described video that is in current use should be updated.

Before submitting a request for closed captioning for a commercially produced multimedia item, contact Reed Library or search Reed Library's website to find videos or DVDs to determine if a captioned version with appropriate licensing is already available.

5. Digital Signs: Digital signage is coordinated and supported through the Information Technology Department. Digital signs are standardized using a common on premise server and software. Departments are responsible for providing and posting accessible content.

Digital signage typically does not include audio. Visual content should be made available in an alternative and accessible medium. As an example, directory information, class schedules, and event notifications are also available on accessible Fort Lewis College websites. Accessible formatted email delivered to Fort Lewis College, provide email accounts in an acceptable alternative medium.

Physical locations and mounting of digital signs will comply with ADA standards:

- Signs must not protrude more than 4 inches from walls.
- Wall-mounted signs which protrude more than 4 inches from the wall must be installed with their lower edge 27 inches or less when measured from the floor.
- Interactive signs must have accessible elements (e.g., buttons) must be placed between 36 and 42 inches when measured from the floor.

Text should be visible at a reasonable distance from the sign:

- Use text colors that have high contrast with the background color.
· Use sans-serif fonts.
· Keep your font sizes large, especially for your main messages. To test size, create a test screen with lines of different font sizes and have people view the screen at the farthest practical distance. Remember that people may view the screen as they pass by.
· Ensure adequate spacing (10 to 35% of stroke for letter spacing, 35-70% of letter height for line spacing) between each element and between letters.

6. Procuring Goods and Services: All technology goods and services procured for use in a FLC program, service, or activity must be reviewed and made accessible to the extent feasible in compliance with the following:

   a. Purchases of new products, software and services:
      i. Must be reviewed by Information Technology or a member of the Digital Accessibility Committee. Signoff is required on the Purchasing Technology Checklist before purchasing or contracting for a product, software or service.
      ii. A Voluntary Product Accessibility Template (VPAT) is required to be attached to the Purchasing Technology Checklist.
      iii. If a product, software or service is determined to not be digitally accessible, the procuring department is responsible to supply a plan for accommodation for the features which are not digitally accessible. The Disability Services Office must approve the accommodation plan before purchasing of a product, software or service.
      iv. This requirement applies to all purchases regardless of funding source.

   b. Renewal of contracts for products, software and services:
      i. Must be reviewed by the Information Technology Department or a member of the Digital Accessibility Committee. Signoff is required on the Purchasing Technology Checklist before purchasing or contracting for a product, software or service.
      ii. A Voluntary Product Accessibility Template (VPAT) is required to be attached to the Purchasing Technology Checklist.
      iii. If a product, software or service is determined to not be digitally accessible, the procuring department or sponsor is responsible to supply a plan for accommodation for the features which are not digitally accessible. The Disability Services Office must approve the
accommodation plan before purchasing of a product, software or service.

iv. If a product, software or service is determined to not be digitally accessible and an acceptable accommodation plan cannot be determined then the product, software or service must be replaced or eliminated before the next renewal period.

v. This requirement applies to all purchases regardless of funding source.

c. Purchasing of products, software and service using a P-card and click through agreement or all free services which do not require the Purchasing Department approval.

i. The procuring department or sponsor is responsible to submit a VPAT to Information Technology for review prior to purchasing or clicking through.

ii. If a product, software or service is determined to not be digitally accessible, the procuring department or sponsor is responsible to supply a plan for accommodation for the features which are not digitally accessible. The Disability Services Office must approve the accommodation plan before purchasing of a product, software or service.

iii. If a department does not comply with a and b then the department will be responsible for making accommodations and all costs associated with an accommodation.

iv. This requirement applies to all purchases regardless of funding source.

7. Other Digital Content: Departments and individuals have a responsibility to ensure communications intended for large audiences related to their program or service are accessible regardless of the medium and cost. These include: emails, promotional materials, maps, video and materials in PDF and other document formats.

Official content that represents the College and is available to the public, students, faculty and staff must be accessible. Social Media officially representing the college must also be accessible. Third party products including mass email, texting and surveys must also be accessible. The use of College supported accessible systems is preferred over third party products.
E. Exceptions: Any exceptions will be reviewed by the Digital Accessibility Committee.

F. Resources
   a. The Disability Services Office
   b. Office of Informational Technology
   c. Information Technology and Digital Accessibility Review Committee
   d. Teaching and Learning Services
   e. Policy Library

G. Information Technology and Digital Accessibility Review Committee

Members of this committee include faculty, staff, student and administrators. The Vice Presidents and the Faculty Senate Executive Board, Associated Students of Fort Lewis College, or their designees, shall appoint committee members.

H. Definitions

Accessibility: A person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally inclusive manner, with substantially equivalent ease of use. The person with a disability, using auxiliary aids if necessary, must be able to obtain the information as fully, equally and independently as a person without a disability.

Digital Signage: An electronic extension of traditional static signage and can be a one-way communication to the audience with not control of content or interactive, where the audience requests specific information through an interface to the display, typically a touchscreen.

Information and Communication Technology: Any electronic system or equipment, and the content contained therein, that is used to create, convert, communicate or duplicate data or information.
IT Service Provider: Any person that designs, builds, implements, supports, or provides an IT service to other college employees, student or affiliates, using a college IT resource. Examples: website administrators, support staff, software programmers, user account administrators

Reasonable Accommodation: Any change to the work or educational environment, or the way things are usually done, that allows an individual with a disability to apply for a job, perform job functions, participate in the academic environment, or enjoy equal access to programs, services or benefits available to individuals without disabilities. The college is required by law to provide reasonable accommodations to qualified individuals with disabilities, unless doing so would impose an undue hardship or results in a fundamental alteration of the program or service.