SUNY Electronic & Information Technology (EIT) Accessibility Committee

Final Report and Recommendations

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Submitted to:
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INTRODUCTION

SUNY colleges and universities increasingly utilize technology to facilitate everything from recruitment to instruction. Consistent with its long-standing commitment to diversity and inclusion, SUNY recognizes the growing responsibilities associated with this reliance on technology to assure that individuals with disabilities and individuals who are temporarily disabled have equitable access to electronic information resources. This is particularly relevant to decisions around purchasing and creating digital content, software, and hardware with the focus rightly placed on universal design, allowing all individuals to engage.

To that end, SUNY Interim Provost Grace Wang convened the **SUNY Electronic & Information Technology (EIT) Accessibility Committee** in November 2017, chaired by Nazely Kurkjian, SUNY System Coordinator of Disability, Diversity, and Nontraditional Student Services. The EIT Committee was comprised of representatives from various campuses sectors, including knowledge experts from Information Technology, Library Services, Disability and Accessibility Services, Instructional and Educational Technology, and Centers for Learning and Teaching. Representatives from SUNY System Administration, including University-wide Procurement, Office of General Counsel, Office of University Life, Design and Printing, Diversity, Equity and Inclusion, Open SUNY and the Center for Professional Development supported the Committee's work (membership listed in Appendix B).

Committee Charge

The EIT Accessibility Committee's charge was to:

> *Develop a systematic approach to maintaining accessible electronic environments for campus community members with disabilities. The EIT Accessibility Committee will devise a SUNY-wide policy and coordinate necessary support activities. Accordingly, the EIT Accessibility Committee will provide guidance for SUNY campuses covering technical standards, roles and responsibilities; establish protocols for new and existing content and technologies, accessible technology acquisitions, and methods for training relevant campus constituents. Policy and guidance recommendations will be presented to the SUNY Board of Trustees.*

Committee's Guiding Principles

From the start, the EIT Accessibility Committee recognized that systematically addressing Electronic Information Accessibility had the potential to:

- promote a more inclusive and welcoming digital environment, particularly for individuals with disabilities;

- enable campuses to address EIT accessibility barriers;

- reduce exposure to the types of legal risks made evident by recent Office of Civil Rights filings;

- empower college students with disabilities to persist and complete their educational goals, due to an accessible EIT infrastructure; and

- leverage the power of SUNY to influence third party vendors to conform to technical accessibility standards.

These are all efforts that support SUNY's goal to be the most inclusive system of higher education in the country.

Designated Subcommittees

Given that the scope of EIT Accessibility is far-reaching, five subcommittees were established to address core EIT areas deemed by the EIT Accessibility Committee as having the greatest impact, specifically: web development, digital content, procurement, classroom technologies, and libraries.

- The Web Development Subcommittee was led by Mark Greenfield – Web Accessibility Officer, University at Buffalo. The subcommittee was charged with developing standards and best practices for web development, design, and functional testing.

- The Digital Content Subcommittee was led by Gabriella Vasta – Coordinator of Access & Equity Services, SUNY Delhi. The subcommittee was charged with developing standards and techniques for creating and adopting digital content.

- The Procurement Subcommittee was led by Nazely Kurkjian – Coordinator of Disability, Diversity & Nontraditional Student Services, SUNY System Administration. The subcommittee was charged with addressing accessibility as a requirement within the procurement process.

- The Classroom Technologies Subcommittee was led by Andrew Tucci – Director of Educational Communications, Binghamton University. The subcommittee was charged with outlining accessibility criteria for renovating or building classroom and public spaces.

- The Libraries Subcommittee was led by Katherine Bertel – Outreach & Engagement Librarian, Buffalo State College. The subcommittee was charged with identifying accessibility best practices of core library functions.

This report summarizes the work of the EIT Accessibility Committee and its subcommittees and outlines its key recommendations.

As explained herein, several System-wide programs and a number of individual campuses have already made important strides to support universal design. That work helped to inform this report and the recommendations of the EIT Accessibility Committee. The Committee was further informed by a review of national best practices and study of relevant laws and promulgated guidelines.

The Committee notes that as the University works together to foster EIT accessibility, individuals with and without disabilities will benefit. It is hoped that new conversations about the importance of accessibility will broaden points of view and lead to innovative solutions that enhance the overall campus experience for all.

DEFINING EIT ACCESSIBILITY

The term 'Electronic and Information Technology Accessibility' stems from Section 508 of the Rehabilitation Act, a set of technical standards established to address accessibility to functional capabilities of various types of technologies. Section 508 standards apply to federal government agencies when they develop, procure, maintain, or use electronic and information technology.

For the purposes of the EIT Accessibility Committee's work and the context of this report, 'Electronic and Information Technologies' refers to 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. EIT includes, but is not limited to, information resources such as the internet and intranet websites, content delivered in digital form, search engines and databases, learning management

systems, classroom technologies; web, computer, and mobile-based applications allowing for interaction between software and users; and services employing information technology and telecommunications equipment.

"Accessible" means, in the case of a program or activity, readily usable by a particular individual, with or without alternate formats; in the case of the web and electronic resources, this report refers to accessibility with or without the use of assistive technology.

"EIT Accessibility" is the practice of sustaining electronic and information technology environments that enable individuals to acquire information, engage in interactions, and enjoy services regardless of whether or not they have a disability. Examples include closed captions on videos, text descriptions for website images (alt text), and text-renderable (searchable) documents.

Why EIT Accessibility is Important

SUNY colleges and universities are consistently attracting and enrolling students with disabilities (NYSED, 2H-2 Survey). As detailed in SUNY's 2017 Diversity, Equity and Inclusion Data Brief, aggregate data reported by SUNY campuses to the New York State Education Department (NYSED) on the 2016 NYSED 2H-2 survey, *Enrollment of College Students with Disabilities*, show that over 24,000 unique students have reported to their campus that they have some type of disability. The self-identification of employees with disabilities at SUNY has also increased.

Additionally, there are likely more students and staff who have opted not to identify and others who, due to injury or life circumstance temporarily have a disability that impacts access to and navigation of electronic information resources. Over the last several years, SUNY has surveyed incoming students, post-admission, to request voluntary information, such as whether or not students self-report having one or more disabilities. More students self-identify as having a disability through this survey than actually self-report on the individual campuses (Student Information Survey, spring 2018). This makes it even more imperative that digital environments are created and maintained accessibly from the beginning.

Although students with disabilities are entering higher education in greater numbers, high school graduates with disabilities complete a college degree at a significantly lower rate when compared to their non-disabled peers (National Council on Disability Briefing Paper, 2015). According to Cornell University's Yang-Tan Institute (2016), in New York State, 18% of New Yorkers aged 21 – 64 years old with disabilities have achieved educational attainment of a Bachelor's degree or higher compared to 39% of New Yorkers without disabilities. This demonstrates an educational attainment equity issue. Improved services and supports to establish accessible learning environments will reduce achievement gaps for individuals with disabilities in New York.

EDUCAUSE, a nonprofit association that helps higher education elevate the impact of IT, has identified Accessibility and Universal Design – educating the community in effective practices and course designs that are accessible by everyone – as a key issue in teaching and learning.

EIT Accessibility offers extensive pedagogical benefits for people with and without disabilities. It leverages the principles of Usability and Universal Design for Learning, which emphasize the importance of meeting the needs of all learners.

These theoretical frameworks focus on optimizing possibilities instead of merely neutralizing disabilities. They are more proactive and promote user independence. Universal Design considers the user experience and assures conformance to accessibility standards. Users have reported that video accessibility has

demonstrated improved comprehension of information, indexing and searching capabilities, accessibility for English as a Second Language persons, and offers greater flexibility for all users (Dallas, Long & McCarthy, 2016).

EIT ACCESSIBILITY AT SUNY

The System Office of the Provost has awarded numerous campuses with Innovative Instruction Technology Grants (IITG) to advance accessibility awareness and inclusive, engaging practices. The SUNY Faculty Advisory Council on Teaching and Technology (FACT[2]), advisory to the System Provost, also committed to furthering the importance of accessibility, specifically in the virtual classroom. The System Center for Professional Development has offered courses and workshops regarding accessibility. The following projects highlight SUNY's efforts:

- Innovative Instruction Technology Grants
    - The Necessity of Accessibility Online (Alfred State College)
    - An Open SUNY Access MOOC for Faculty and Staff Development: Creating Online Courses that Provide Access for All (Empire State College and Buffalo State College)
    - Utilizing Assistive Technology and a Student-driven Universal Design Methodology to Improve Course Accessibility, Classroom Inclusivity and Student Engagement (SUNY Oneonta)

- Faculty Advisory Council on Teaching and Technology (FACT[2])
    - [Accessibility: Designing and Teaching Courses for All Learners](MOOC)
    - [Accessibility Symposium]

- Open SUNY
    - The [Open SUNY Course Quality Review Rubric] (OSCQR) was adopted by the Online Learning Consortium (OLC) as part of their suite of nationally recognized and nationally endorsed scorecards for quality assurance in online learning. It includes accessibility criteria for course design and development.
    - The purchase and inclusion of the Ally tool in Blackboard as part of SUNY's LMS contract. As of fall 2018, 32 campuses have signed on and began to implement Ally, a tool designed to increase awareness of accessibility within courses and provide students an opportunity to convert course materials into a preferred format (e.g., audio, electronic braille).

- Other
    - The [SUNY Open Education Resources] (OER) Initiative is proactively addressing open instructional content accessibility.
    - Open SUNY and the SUNY Center for Professional Development have worked with vendors to negotiate discounted pricing for SUNY campuses for critical accessibility tools and services, including closed captioning, live captioning and text to speech solutions. The goal of which is to provide cost effective solutions in order to sustain digital accessibility and promote independent access. Further, once campuses have identified quality vendors, we are in a unique position to install university-wide agreements in hopes of obtaining better pricing and to facilitate the procurement of accessibility tools for SUNY campuses.

- The [SUNY Information Technology Exchange Center](#) (ITEC) established an accessibility pilot with a third party vendor to help campuses sustain accessible video content.

EIT Accessibility of System Administration and Campus Websites

An initial review of SUNY System Administration and individual SUNY campus websites show broad variation. Some campuses include EIT accessibility in broader web content policies. Specifically, 34 campuses (22 state-operated Campuses and 12 community colleges) and SUNY Administration have disability or accessibility-related information available from the main website. Links on campus websites routinely lead users to Notices of ADA Obligations, Web Accessibility Commitment Statements and/or Policy, and several link to the Campus Disability Services Office web pages. Numerous campuses also have web pages dedicated to support faculty and staff in designing, locating, and monitoring accessible content. There are existing campus websites that do not currently address web or EIT accessibility.

Forward-thinking Philosophies and Practices across SUNY Campuses

A number of examples of campuses embracing a shared responsibility for accessibility were also identified. Inclusion efforts are supported by faculty and staff across divisions and departments.

- SUNY New Paltz has a collective effort between Information Technology, Marketing & Communications, and Instructional Technology. Together, they share responsibilities to support the campus community in promoting accessible digital environments. IT offers general training sessions, Instructional Designers offer remediation drop-in hours, and provide additional one-on-one training is available.

- Mechanisms for easily ensuring accessibility. For example, Mohawk Valley Community College has automated website testing; Onondaga Community College uses a product called SensusAccess, which translates documents into a number of different accessible formats; and, Buffalo State has a setup within their video management system for faculty to have one-click access to submitting videos for closed captioning.

Campuses have established Working Groups to improve on existing accessibility efforts and further quality assurance.

- SUNY Cortland has a Technology Accessibility Advisory Council, chaired by their Chief Information Officer.

- Columbia Greene Community College recently formed a Website Committee.

- SUNY Geneseo has a committee addressing website accessibility.

Campuses offer a wide range of professional development to support digital accessibility.

- Buffalo State College and Empire State College created a free Massive Open Online Course titled [Accessibility: Designing and Teaching Courses for All Learners](#). This course is offered in asynchronous and synchronous modes.

- SUNY Delhi's Access & Equity Office offers two courses related to supporting students with disabilities and access in the digital age.

- SUNY Geneseo requires training for web editors who have editing privileges for the campus Content Management system.

- Alfred State hosted an [Accessibility Conference](#) (2016).

- The University at Buffalo has audited its own EIT accessibility and begun the implementation of a sustainable web accessibility program.

- SUNY Oswego recently established an [Accessibility Fellow Program](#) to promote inclusive pedagogy across various colleges.

- Buffalo State College hosted a conference titled [Accessibility: Designing Access for All Learners](#) (2019).

NATIONAL CONTEXT

Relevant EIT Regulations, Laws, and Guidance

Over the last several years, colleges and universities have faced complaints, investigations, and litigation regarding the inaccessibility of their online environments for individuals with disabilities. Many SUNY campuses and SUNY System have been directly affected over the past 24 months through complainant-initiated investigations by the federal Department of Education's Office for Civil Rights (OCR). Although SUNY has successfully resolved (or is in the process of resolving) these complaints, an aggressive effort by advocates and law firms has emerged targeting institutions that fail to meet their minimum obligations for maintaining an accessible digital environment.

While there remains some uncertainty about the precise technical standards required for ADA compliance, it is clear that postsecondary institutions must make their EIT accessible in order to comply with the Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990. At a minimum, this means that campuses must ensure that students with disabilities have an opportunity equal to that of their nondisabled peers to participate in their institution's programs, benefits, and services, including those delivered through electronic and information technology, except where doing so would impose an "undue burden" or necessitate a fundamental alteration.

Recently, OCR has been more open about its use of WCAG 2.0 as a benchmark. Although there is still no regulatory guidance on the matter, sub-regulatory guidance in the form of official presentations has been made available and confirms that WCAG is generally viewed by OCR as the generic standard for minimal compliance with Section 504. Moreover, the resolution agreements entered into by several SUNY campuses specifically identified WCAG 2.0 as the standard by which compliance would be measured. However, the lack of a formal adoption of WCAG 2.0 by OCR and the courts provides some flexibility for institutions to craft their own standards that are customized and adapted to their specific needs and goals.

The EIT Accessibility Committee examined existing technical standards, including but not limited to WCAG, recent OCR priorities and reports, and state and federal laws. The proposed standards are meant to maintain Section 504 compliance in according to OCR's guidance, ease the burden of adoption by conforming to the style and content used by our systems, and to allow SUNY campuses and System Administration to achieve its mission of access and its goal to become the most inclusive education system in the country.

National EIT Accessibility Efforts

Due to the increasingly digital delivery of higher education, as well as regulatory scrutiny, EIT Accessibility issues have come to the forefront of campus policy and practice discussions. While the interactive process may necessitate academic adjustments and modifications (accommodations) for students with disabilities to have equal access to higher education, the institution also has an obligation to sustain an accessible digital infrastructure proactively. Similar to physical accessibility standards outlined in the ADA, institutions cannot wait for students, employees, and prospective visitors to disclose their disability, so as not to exclude them from opportunities readily available to their non-disabled counterparts.

This evolving field is guided and informed by the expertise of the national [Association on Higher Education and Disability](#) (AHEAD), a diverse representation of higher education and related professionals committed to advancing accessibility.

Many systems of higher education continuously address the nuances of sustaining EIT Accessibility. The EIT Accessibility Committee examined numerous web and EIT accessibility policies and practices in colleges and university systems across the United States. In addition, members of the Committee attended the national, annual [Accessing Higher Grounds Conference](#) to gather additional information and insight from postsecondary institutions addressing accessible media, web and technologies. The Committee specifically investigated policies at the following postsecondary entities:

- [University of Montana](#): Electronic and Information Technology Accessibility (EITA)

- [University of California System](#): Information Technology Accessibility

- [The Ohio State University](#): Web Accessibility

- [California State University](#): Accessible Technology Initiative Coded Memorandum AA-2015-22

The language and structure of each policy and related standards or procedures were carefully assessed to guide the development of a framework that would work best for the SUNY System. Our thanks to these institutions for their ongoing efforts in this important area.

EIT ACCESSIBILITY COMMITTEE RECOMMENDATIONS

A. Overview of Recommendations

Although far-reaching efforts have taken place across SUNY to enhance awareness of accessibility in online environments, it is clear that more needs to be done to address barriers facing individuals with disabilities accessing and navigating the University's programs, services, and activities. The EIT Accessibility Committee offers the following recommendations to build on existing efforts to improve equity and inclusion for individuals with disabilities:

1. **SUNY should adopt a system-wide Electronic and Information Technology Accessibility policy to ensure appropriate campus and system-level commitment to support equal and integrated access to all of its programs, services, and activities, particularly for individuals with disabilities, especially in the realm of electronic and information technologies.**

    a. **EIT Accessibility must be recognized as the responsibility of all administrators, faculty, and staff.**

    b. **System Administration and campuses shall develop, purchase, host, and/or acquire, to the extent feasible, web pages, websites, hardware and software products and services that are accessible to persons with disabilities.**

2. **Each campus president and the Chancellor for System Administration shall designate an EIT Accessibility Officer. EIT Accessibility Officers will be responsible for issuing, updating, and enforcing any requirements, standards, or guidelines supported by SUNY policy.**

3. **The EIT Accessibility Officer is responsible for assuring the collaborative development of an Accessibility Plan, consistent with local shared and faculty governance processes.**

4. **System Administration and all campuses shall develop an Accessibility Plan to promote ongoing, inclusive access for individuals with disabilities.**

    a. **Each plan should serve as an accessibility action strategy that will be regularly evaluated, modified, and strengthened over time—in response to changing requirements, feedback and review of outcomes and effectiveness.**

    b. **Minimum core elements of each Accessibility Plan should be as follows: Authority and Responsibility; Awareness; Design; Procurement; Monitoring Compliance; Training (see B. Recommendation Guidelines below, 2. Campus Accessibility Plan); and review and revision process and procedures.**

5. **For purposes of consistency and risk management, campuses are strongly encouraged to use Standards created by the EIT Accessibility Committee, to sustain accessible electronic and information technology environments (see B. Recommendation Guidelines below, 4. Standards).**

    a. **Recognizing that technology and technical accessibility standards evolve, the Committee recommends designated EIT Accessibility Officers create communities of practice to propose necessary changes to the Standards over time.**

B. Recommendation Guidelines

The EIT Accessibility Committee has developed the following EIT Accessibility Guidelines which delineate and detail the above recommendations. They are designed to provide campuses with information sufficient to comply with the above recommendations and to support campus efforts in making related decisions.

Importantly, included in these Guidelines are what the EIT Accessibility Committee recommends as structures and functions to be included as part of campus plans to be used, at a minimum, to ensure that individuals with disabilities have an equal opportunity to participate in the University's programs, services, and activities delivered online and in the classroom.

References: Title II, Americans with Disabilities Act; Section 504 of the Rehabilitation Act of 1973.

1. **EIT Accessibility Officer**

Each campus president and the Chancellor for System Administration must designate and authorize an EIT Accessibility Officer to set the direction for ongoing digital accessibility efforts, including the development and oversight of each campus Accessibility Program. EIT Accessibility Officers must address an expansive scope of electronic and information technologies. Example duties include, but are not limited to:

- Establish policies and procedures that support shared institutional obligations to provide accessible online environments for campus community members and visitors.
- Assign roles and responsibilities for achieving policy compliance.
- Create communication plans to promote and support a campus-wide EIT accessibility program.
- Develop a strategy to incorporate accessibility into the creation of electronic information resources.
- Collaborate and extensively work with Purchasing and other campus departments to ensure acquisition of accessible EIT products and services.
- Continuously monitor and assess existing and pending EIT.
- Coordinate or devise training programs for campus personnel who create, purchase, and maintain EIT.

At the campuses' election, this work can be completed by a group or team of individuals or offices, but the Committee believes that a single Officer must be appointed in order to ensure accountability and coordination and to communicate with System Administration and other campus colleagues as necessary to ensure consistency across the system. This approach is consistent with other SUNY-wide policies such as diversity, equity and inclusion, records retention and disposition, and FOIL.

Additionally, a Community of Practice consisting of EIT Accessibility Offers is strongly encouraged, to share best practices and improve on economies of scale.

2. **Accessibility Plans**

The purpose of the Accessibility Plan is to establish policies and procedures that address EIT accessibility in a far-reaching way. Each campus and System Administration must establish their own Accessibility Plan to determine where the greatest needs are, identify risks, and develop clearly defined action steps with assigned ownership for completion.

At minimum, each Accessibility Plan shall include the following:

a) Authority and Responsibility: An assignment of roles, authority, responsibility and accountability for achieving policy compliance.

b) Awareness Raising: A campaign to communicate EIT accessibility across all campus divisions and departments.

c) Design: A comprehensive approach to engrain accessibility into the creation of web and technology resources.

d) Procurement: A procedure to include accessibility as a requirement within purchasing processes, including centralized and decentralized purchasing activities.

e) Monitoring Compliance: A means for monitoring compliance with any standards listed in this document.

f) Training: A method for training all University personnel who develop, select, purchase and maintain electronic and information technologies.

Campuses that have entered into resolution agreements with OCR will already be familiar with accessibility plan creation and may even have documents in place that address many of the elements recommended here in the form of a *Corrective Action Plan* and a *Plan for New Content,* typically required by OCR's 2017 resolution agreements. Other campuses will also benefit from the models created under these OCR frameworks.

Importantly, Accessibility Plans are living documents, representing an accessibility action strategy, and will need to be modified and updated over time in response to new technology requirements, user feedback, and the regular review of outcomes and effectiveness.

3. Action and Quality Assurance

Compliance with the action and quality assurance items listed in this section will be required of all SUNY campuses, except where doing so would constitute a fundamental alteration of the nature of the EIT or impose an undue burden:

- Provide and publicize assurances of nondiscrimination, commitment to accessibility, and a mechanism by which students, faculty, staff, and members of the public can report EIT accessibility barriers. Formalize a process to remediate and resolve EIT accessibility barriers in a timely manner.

- Ensure that all web pages and content published by any college, department, program, or unit must be in compliance with the standards outlined in this document. With regards to legacy and archived EIT, there must be a process and plan to provide Equally Effective Alternative Access upon request.

- Establish workflows to include evaluating, and monitoring accessibility for all electronic and information technology purchases and freeware, including but not limited to publisher materials and Open Educational Resources.

- For existing EIT, create a protocol to assess accessibility impact in order to prioritize bringing EIT into conformance with the standards below.

- Set up and maintain an Exceptions procedure and plan to provide Equally Effective Alternate Access to non-conforming electronic and information technologies.

4. Standards

Conformance to standards listed in this section must be given high priority in the development and implementation of an Accessibility Plan. University campuses and programs are encouraged to go above and beyond the standards listed in Table 1.

1. **Websites and Software:** Web Accessibility Standards (WAS)
2. **Digital Content:** Digital Content Accessibility Standards (DCAS)
3. **Classroom Technology & Design:** Classroom Accessibility Standards (CAS)
4. **Libraries:** Library Accessibility Guidelines (LAG)
5. **Procurement:** Procurement Accessibility Conformance Standards (PACS)

The following set of standards are modeled after federal law, international technical accessibility standards, and national best practices. These standards provide a clear and consistent path to prioritize certain standards, and have a process in place to remediate inaccessible EIT upon request. For each standard, further guidance has been developed as resources for campuses and System Administration. Guidance will be published on the SUNY Accessibility Website.

In accordance with the EIT Accessibility Guidelines, conformance to the following standards must be given high priority in the development and implementation of the Accessibility Program. Each standard is categorized as "required" or "strongly recommended." Each campus should determine the applicability of the standards to relevant stakeholders based on their campus-specific policies, governance models, and technologies. Key stakeholders may include, but are not limited to, the following functional administrative, academic, and student services areas:

- Academic Affairs
- Student Affairs
- Risk Management
- Information Technologies
- Auxiliary Services
- Libraries
- Diversity, Equity & Inclusion
- Disability and Accessibility Resources
- Admissions and Enrollment Management
- Communications and Marketing
- Business Operations and Procurement
- Distance Education

5. Assistive Technology

Access to and utilization of assistive technologies are essential to achieving EIT Accessibility. Assistive technology can be defined as any item, piece of equipment, or system, whether acquired commercially, modified, or customized, that is commonly used to increase, maintain, or improve functional capabilities of

individuals with disabilities. Examples of assistive technologies include, but are not limited to, screen magnification, screen reader, speech-to-text, text-to-speech, and other specialized software.

Assistive technologies should be made available to students, faculty and staff in pursuit of their collegiate and employment goals. There are numerous free and fee-based assistive technology options already available throughout SUNY campuses. Historically, these technologies have been available through the Offices for Student Accessibility/Disability Resources. The Committee strongly recommends having these technologies readily available on campus, particularly in public computing labs and libraries in order to afford campus community members the broadest possible access.

C. Recommended Standards

Table 1. Web Accessibility Standards (WAS)

The following standards have been created to provide guidance on web accessibility. These standards are based on the Web Content Accessibility Guidelines (WCAG). Reference: Web Content Accessibility Guidelines (WCAG).

Note: Campus adopted EIT often has accessibility built into its platform (e.g., CRM, LMS, Office 365). While the EIT may be accessible on its face, the individual developer or content editor must be mindful that certain design decisions may inadvertently reduce access for users with disabilities. Fortunately, many of these tools include automated accessibility checkers and templates to assist with maintaining accessible EIT. To add, there are many free or low-cost tools and methods to quickly evaluate the level of accessibility of websites and electronic content.

Web Accessibility Standards		
Images	**Required**	**Strongly Recommended**
Provide meaningful alt text for all images, except cases described below:	x	
Use null alt text for decorative images (alt="")	x	
Images used as links (without accompanying text description) have alt text indicating link target	x	
If the same visual presentation can be made using text alone, an image is not used to present that text		x
When a text link and image link with the same URL are grouped, use a single <a> element and a null alt tag for the image		x
Multimedia	**Required**	**Strongly Recommended**
Establish a timely process for requesting synchronized captions for multimedia	x	
Provide synchronized captions for public-facing audio-video content	x	
Provide transcripts for audio-only content	x	
Provide descriptive audio for audio-video and video-only content, when needed	x	
Ensure audio and video does not begin playing on page load	x	
Provide synchronized captions for live audio-video content		x
Color	**Required**	**Strongly Recommended**
Color is not the only means used to convey information	x	
There is sufficient contrast between foreground and background text	x	
There is sufficient contrast when color is used to convey information		x
Links	**Required**	**Strongly Recommended**
Link text describes the destination of the link	x	
All links are distinguishable.	x	
Structure	**Required**	**Strongly Recommended**
Heading structure is logical	x	
Heading structure includes an H1 tag and does not skip levels		x
Reading order is logical and intuitive	x	

Web Accessibility Standards		
Information and relationships that are implied by visual or auditory formatting are conveyed in accessible ways.	x	
Keyboard/Navigation	*Required*	*Strongly Recommended*
Provide a method to skip repetitive navigation	x	
The option to skip links is the first option when tabbing		x
All links are available using the keyboard	x	
There are no "keyboard traps"	x	
The tabbing order is logical	x	
Keyboard focus is visible	x	
Presentation, layout, and navigation are consistent for repeated content	x	
Labels/Titles	*Required*	*Strongly Recommended*
All form controls are properly labeled	x	
All tables are properly labeled	x	
Frames and iFrames have appropriate titles	x	
Miscellaneous	*Required*	*Strongly Recommended*
Every page contains a link to an accessibility statement that provides contact information to get help if needed		x
The page is readable and functional when text size is doubled	x	
The page has a descriptive page title		x
The language of the page is identified using the HTML lang attribute	x	
Instructions do not rely solely on size, shape, color, or visual location	x	
No content flashes more than 3 times per second	x	
If a page has a timing, the user is given options to turn off, adjust or extend the timing	x	
Multiple ways are available to find other web pages on the site		x
When appropriate, the language of sections of content that are in different languages are identified, for example, by using the lang attribute		x

Table 2. Digital Content Accessibility Standards (DCAS)

The standard below serves to summarize digital content accessibility standards associated with the Web Content Accessibility Guidelines (WCAG). These standards apply to digital materials, including, but not limited to, locating and creating digital content for public and controlled consumption. Reference: Web Content Accessibility Guidelines (WCAG).

Note: Campus adopted EIT often has accessibility built into its platform (e.g., CRM, LMS, Office 365). While the EIT may be accessible on its face, the individual developer or content editor must be mindful that certain design decisions may inadvertently reduce access for users with disabilities. Fortunately, many of these tools include automated accessibility checkers and templates to assist with maintaining accessible EIT. To add, there are many free or low-cost tools and methods to quickly evaluate the level of accessibility of websites and electronic content.

Digital Content Accessibility Standards		
Text Alternatives & Color	*Required*	*Strongly Recommended*
A text equivalent for every non-text element is provided ("alt" tags/text, captions, transcripts, etc.).	x	
Color is not the only means used to convey information	x	
Link text describes the destination of the link (No "click here" or "learn more")	x	
All links are distinguishable (must be able to differentiate links from non-link text)	x	
Use readable fonts and sizes, color contrast, and keep number of fonts used to a minimum	x	
Graphs, charts and maps include contextual or supporting details in text surrounding the image		x
Data Tables	*Required*	*Strongly Recommended*
Table header rows and columns are assigned	x	
When possible, information is displayed in a linear format not as a table		x
Avoid split cells, empty cells, merged cells, and embedded tables		x
Images	*Required*	*Strongly Recommended*
Provide meaningful alt text for all images, except as described below:	x	
Use null alt text for decorative images (alt= "")	x	
Images used as links (without accompanying text description) have alt text indicating link target	x	
If the same visual presentation can be made using text alone, an image is not used to present that text.		x
Formulas	*Required*	*Strongly Recommended*
For web pages, use an equation editor that outputs MathML. (e.g., MathType)	x	
For documents and presentations, use an equation editor that supports accessibility (e.g., MathType)	x	
Structure and Navigation	*Required*	*Strongly Recommended*
Use source (original) document when possible - apply accessibility features within source document		x
The document contains a descriptive page title that makes sense	x	
Heading structure includes an H1 tag and does not skip levels (is sequential)		x
Use the built-in features, styles, and templates (including predefined slides) of software to align spacing and designate lists		x
Use different titles for each presentation slide		x
Fillable documents (forms) are labeled appropriately	x	
Machine readable (ensure doc is not an image and text is renderable)	x	
Keyboard navigable	x	
Reading order is logical and intuitive (Verify reading order using tab key)	x	
Multimedia	*Required*	*Strongly Recommended*
Establish a timely process for requesting synchronized captions for multimedia	x	

Digital Content Accessibility Standards		
Provide synchronized captions for newly created or adopted audio-video content	x	
Provide transcripts for audio-only content	x	
Provide descriptive audio for audio-video and video-only content, when needed	x	
Ensure video player controls are available and accessible via keyboard	x	
Ensure audio and video does not begin playing on page load	x	
Provide synchronized captions for live audio-video content		x
Accessibility Awareness & Verification	*Required*	*Strongly Recommended*
Use built-in accessibility checkers in various software tools (e.g., Microsoft Office, Adobe Acrobat)		x
Course syllabi contain an accessibility statement to inform students of available campus resources	x	
Newly developed courses undergo accessibility review		x
Recurring existing courses undergo accessibility review		x

Table 3. Classroom Accessibility Standards (CAS)

The following standard serves to summarize many of the pertinent building standards and codes associated with general purpose Classrooms within the State of New York. Reference: 2010 ADA Standards for Accessible Design.

Classroom Accessibility Standards		
Assistive Listening Systems Availability*	*Required*	*Strongly Recommended*
For spaces less than or equal to 50 seats = 2 receivers	x	
51 - 200 seats = 2 receivers plus 1 receiver per every 25 seats over 50	x	
201 - 500 seats = 2 receivers plus 1 receiver per every 25 seats over 50	x	
501 - 1000 seats = 20 receivers plus 1 per every 33 seats over 500	x	
1001 - 2000 seats = 35 receivers plus 1 per every 50 seats over 1000	x	
2001 and over = 55 receivers plus 1 per every 100 seats over 2000 seats	x	
Assisted Listening Systems shall be capable of providing audio at a sound pressure range between 110dB to 118dB, with a volume sweep of 50dB	x	
Hearing Loop installation		x
Summed audio output available in room AV system		x
Classroom Controls – Color Blindness	*Required*	*Strongly Recommended*
Color choices on control systems should reflect universal design for common color blindness accommodation (Top choices would be black, yellow/orange, blue)		x
Emergency Notifications in Classrooms should reflect universal design for common color blindness accommodation (Top choices would be black, yellow/orange, blue)		x

* Assisted Listening Systems come in many shapes and delivery methods. Wi-Fi, FM, RF, and Bluetooth systems can be leveraged in order to keep costs low. Systems specific to individuals can be used in lieu of installed systems, and still meet the regulations.

Table 4. Library Accessibility Guidelines (LAG)

This set of guidelines serves to support Campus Libraries in promoting best practices to achieve EIT Accessibility as it pertains to critical library functions, including but not limited to, services, collections, and spaces. Refer to other standards listed in this document where relevant and essential to delivering accessible library services and supports. References: [ALA Library Services for People with Disabilities Policy](#) and [IFLA Access to Libraries for Persons with Disabilities](#).

Library Accessibility Guidelines		
Library Services	*Required*	*Strongly Recommended*
Establish policies and procedures for making library materials accessible in a variety of formats (e.g., requests for accommodation, alternative format, OCR scans	x	
Provide instructions, documentation, and handouts available in an accessible digital format upon request		x
Provide access, resource, and service information on a library accessibility webpage (see the Non-EIT Appendix for additional web page recommendations)		x
Designate a liaison or contact within the library to provide EIT-related support	x	
Provide training to library staff on available assistive technology and EIT best practices		x
Provide assistive technologies and equipment in computer labs, particularly in specialized spaces such as makerspaces		x
Digitizing Content	*Required*	*Strongly Recommended*
Ensure documents and forms digitized or hosted by the library are accessible, or can be made accessible upon request	x	
Perform high quality source document scans	x	
When scans for instructional and research materials are requested (e.g., course reserves, ILL), conduct basic OCR scans (text-renderable). Purchasing a new digital document, physical book, or processing by an external vendor may be required to achieve basic accessibility.	x	
Identify and purchase materials that are captioned, or allow and promote the use of interlibrary loan to request captioned titles if your library owns the (uncaptioned) item	x	
Include transcripts for any media recordings	x	

Table 5. Procurement Accessibility Conformance Standards (PACS)

Consistent with expectations of the field, and requirements emerging from case law, the following checklist was created to proactively address EIT accessibility within purchasing policies and procedures. These standards are targeted to anyone involved in purchasing electronic and information technologies.

Procurement Accessibility Conformance Standards		
Preliminary Steps	*Required*	*Strongly Recommended*
Gauge potential impact on the University of a particular product or service's accessibility	x	
Gathering Information	*Required*	*Strongly Recommended*
Include accessibility in pre-purchase documents/questionnaires	x	
Commitment to accessibility is reflected in RFP language	x	

Procurement Accessibility Conformance Standards		
Collect documentation verifying EIT accessibility conformance (Voluntary Product Accessibility Template)	x	
Obtain Accessibility Roadmap - document which addresses all [application] interface accessibility gaps, describe the timelines by which these accessibility gaps will be remediated, as well as recommendations regarding interim workarounds.	x	
Review Product/Service	*Required*	*Strongly Recommended*
High impact EIT products and services should be evaluated by an appropriately qualified individual or entity. This evaluation should be documented and can be performed by campus personnel or through third-party vendors. Cost for an external evaluation can be deferred to the prospective vendor(s).	x	
Conduct Exceptions on a case-by-case basis	x	
Evaluate RFP EIT finalists through live accessibility demonstration		x
Prepare an Equally Effective Alternate Access Plan for non-conforming EIT	x	
Place Order	*Required*	*Strongly Recommended*
Include accessibility assurances in purchase agreements; add milestones to remediate accessibility gaps identified in accessibility roadmap	x	
Set a calendar date to check in with vendor on accessibility improvements (e.g., annually)		x

Appendix A: Glossary of Terms

The following terms are defined solely for the purposes of this report.

Accessible: In the case of a program or activity, readily usable by a particular individual, with or without alternate formats; in the case of the web and electronic resources, accessible with or without the use of assistive technology.

Alternate Format: Refers to alternatives to standard print. Information presented in an accessible format (examples: electronic, audio, large print, or Braille).

Archived EIT: EIT containing core administrative or academic information, official records, and similar information that are no longer available to a wide audience, but are subject to record retention plans. Note that technology components such as software applications and hardware devices are not placed in an archive status.

Assistive Technology: Any item, piece of equipment, or system, whether acquired commercially, modified, or customized, that is commonly used to increase, maintain, or improve functional capabilities of individuals with disabilities.

Classroom Accessibility Standards: A summary listing of all pertinent building code and classroom technology system feature that should be included when constructing / renovating SUNY classrooms. These features draw heavily from the 2010 ADA building standards on federal and state property.

Digital Content Accessibility Standards: In addition to the accessibility standards codified in the Web Accessibility Standards (WAS), requirements and recommendations touch on documents, multimedia, and quality course-building that is inclusive of accessibility.

Electronic and information technologies (EIT): 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. EIT includes, but is not limited to, information resources such as the internet and intranet websites, content delivered in digital form, search engines and databases, learning management systems, classroom technologies; web, computer, and mobile-based applications allowing for interaction between software and users; and services employing information technology and telecommunications equipment.

Equally Effective Alternate Access: The alternative format communicates the same information in as timely a fashion as does the original Web page. For interactive applications and hardware devices, "equally effective" means that the user action (e.g., registration) is accomplished in a comparable time and with comparable effort on the part of the requester.

Exceptions: In certain cases, meeting the accessibility standards required by these guidelines may not be feasible due to an undue burden or doing so would result in a fundamental alteration. Such assertions may only be made by the president or designee who has budgetary authority after considering all resources available for use, and must be accompanied by written statement of the reasons why. These difficulties do not relieve University programs or services from meeting EIT accessibility obligations. Equally Effective Alternative Access must be provided upon request.

Existing EIT: Any EIT purchased or adopted prior to June 2018.

Legacy Content: Any digital content materials produced and published before January 2017.

Library Accessibility Standards: Accessibility best practices and guidance as it pertains to critical library functions including services, collections, physical and digital environments.

Procurement Accessibility Conformance Standards: Checklist for including accessibility as a requirement within the purchasing process for electronic information and technologies.

Web Accessibility Standards: Baseline requirements for compliance with the international web accessibility guidelines - Web Content Accessibility Guidelines (WCAG). Campuses are encouraged to go above and beyond these standards to ensure websites are accessible and usable to all.

Appendix B: Committee and Subcommittee Members

Committee and subcommittee members represented key stakeholders across SUNY. Additional consultation with professionals representing the interests of finance, facilities, role-alike groups and shared governance bodies contributed to the final recommendations within this Report.

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Emily Trapp, Director, Instructional Media Services, SUNY New Paltz

Appendix C: Associated Standards and Guidelines

The following standards and guidelines are included here as they represent responsibilities/requirements related to electronic and information technology accessibility.

Classroom Accessibility Standards		
Classroom Seating and Access	*Required*	*Strongly Recommended*
Classrooms with 4 - 25 seats, 1 wheelchair space required	x	
Classrooms with 26 - 50 seats, 2 wheelchair spaces required	x	
Classrooms with 51 - 150 seats, 4 wheelchair spaces required	x	
Classrooms with 151 - 300 seats, 5 wheelchair spaces required	x	
Classrooms with 301 - 500 seats, 6 wheelchair spaces required	x	
Classrooms with 501 - 5000 seats, 6 wheelchair spaces plus 1 for each 150 above 501.	x	
Classrooms with 5001 and over, 36 wheelchair spaces plus 1 for each 200 over 500.	x	
A single wheelchair space is defined as 36" x 48", making provisions for space entry, turnaround, and knee/toe clearance	x	
Wheelchair spaces shall have similar lines of sight to instructor as other student stations	x	
Accessible pathways in to and out of classrooms shall be 36" wide, with no less than 32" of passing clearance based on wall features	x	
Doors and doorways to Classrooms shall conform to section 403 standards based on how the classroom is set up (entry & exit points, hallways, door opening direction, double doors, etc.)	x	
Wheelchair turn around space shall be accommodated based on space needs of wheelchair spaces, including instructor area. Various provisions exist based on room layouts.	x	
Bariatric seating options should be made available wherever possible		x
Signage	*Required*	*Strongly Recommended*
Accessible Room features like Assisted Listening Systems shall include appropriate signage indicating their availability and information on how to obtain them (or responsible office contact information). Signage shall be conspicuously placed.	x	
Doors at exit passages shall include tactile signage at 48" above finished floor	x	
Wheelchair accessible student stations are to be identified by common symbol	x	

Library Accessibility Guidelines		
Webpage for Library Accessibility (Includes the Following Information)	*Required*	*Strongly Recommended*
Liaison or contact person within the library for general accessibility support, if different from EIT-accessibility liaison	x	
Information about adaptive software or technology available through the library	x	
Elevator, entrance, and restroom access		x
Information about circulating adaptive technology, if available		x
Additional Library Services	*Required*	*Strongly Recommended*
Provide clear signage for scanner and print stations		x

Library Accessibility Guidelines		
Event materials have an equal access statement to provide patrons an opportunity to request accommodations		x
Consider accessibility when making furniture and layout choices (i.e. height of furniture, adjustable or not, leaving wide enough paths, placement/storage of tools) - refer to Classroom Technology and Design standards for further guidance	x	
Collection development should include materials with accurate and current information on the spectrum of disabilities, issues, and services.	x	
Assistive Technology	*Required*	*Strongly Recommended*
Accessible technology is made readily available to students, faculty, and staff using library resources	x	
Clearly advertise where and how to access assistive software or hardware (e.g. webpage for library accessibility)	x	
Incorporate induction loop technology in rooms where events/speakers are hosted - refer to Classroom Technology and Design standards for further guidance		x
Basic Technology (free or low cost):		
Screen magnification (Zoom Text)	x	
Text magnification - hard copy (CCTV)	x	
Screen reader	x	
Large type/contrast keyboard; alphabet-order keyboards	x	
Furniture at appropriate height for wheelchairs	x	
Advanced Technology (paid licenses or higher cost):		
Speech-to-text (Dragon Naturally) and text-to-speech (Kurzweil 3000, JAWS, Read&Write GOLD)		x
Braille embosser/printer with conversion software		x
Specialized hardware (noise reduction headphones, trackball mouse, microphones, etc.)		x
Separate Assistive Technology Labs/Spaces and Other Accommodations:		
Scent-free		x
Quieter/reduced stimulus space		x
Adjustable tables and/or chairs		x
Access to more specialized software and equipment (paid licenses)		x
Provide assistive technology kits that can be borrowed, include items such as trackball mouse, large type keyboard, magnifiers		x

Appendix D: References

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