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Accessible IT | Feature

Access Denied

Making university websites and course content accessible may be the law, but many institutions have a long way to go toward compliance. CT looks at three key elements of a more proactive approach to accessibility on campus.

- By David Raths
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Anita Colyer Graham remembers the first time she watched a blind student use screen reader software to access the digital content in <u>Penn State's World Campus</u> courses. "It was a profound and changing experience for me to see how difficult it was for her," says Colyer Graham, who has been manager of access at the World Campus (the university's online campus) since 2008. "I was sitting with other IT people and we all said, 'Wow, now we understand why students are having real problems.' We knew there was a lot of work to be done."

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As faculty members add online and multimedia elements to their courses, colleges and universities across the country are realizing that there is indeed a lot of work to be done to ensure that disabled students (and employees) have equal access to course material and university websites. Unfortunately, far too few schools consider the task a top priority.

"It is dismaying when campus technology leaders list their top 10 IT concerns and accessibility doesn't even make the list," complains Greg Kraus, IT accessibility coordinator for <u>North Carolina State</u> <u>University</u> (NCSU).

A Bleak Picture

A recent study indicates just how unprepared higher education is. Last year, Lani Van Dusen, director of the <u>Worldwide Institute for Research and Evaluation</u>, examined web pages from 100 two- and fouryear colleges and universities selected at random. Only one-third had a posted policy about web accessibility, and only 17 percent of those had visible guidelines for faculty or instructional technologists. Only two institutions mentioned IT accessibility in their accreditation-improvement plans.

Using an automated tool that recognizes glaring accessibility issues, Van Dusen examined the home page, student services page, and course-offerings page of each institution. "One university had 88 accessibility issues in three pages," Van Dusen says. "The average was 17 errors over the three pages." Common errors ranged from missing page headers to images that couldn't be paired with their captions.

"Those results paint a pretty bleak picture," says Cyndi Rowland, director of the <u>National Center on</u> <u>Disability Access to Education</u> at the <u>Center for Persons with Disabilities</u> at <u>Utah State University</u>. "At this point in our nation's history, when we know how much access to higher education and civic participation means, to see that this is still not happening is discouraging."

Even those universities that have now devoted considerable resources to IT accessibility, including Penn State, have only been prodded into action as a result of complaints by organizations such as the <u>National Federation of the Blind</u> (NFB). Others, such as California's state universities, are following state laws that require their public facilities to abide by <u>Section 508</u> of the Rehabilitation Act of 1973, which includes web-accessibility requirements.

Based on recent developments, the price of inaction may well extend beyond the harm done to disabled students. There may be legal ramifications that could prove costly. "There is a lot of pressure on IT because of budget cuts and being asked to do more with less, so it is easy to ask what the payoff is for [making technology accessible]," says Kraus. "But what is the cost of not doing it? It's like people who don't buy insurance until something bad happens, and then say, 'Oh, I guess I should have bought insurance.'"

Just this year, <u>The Florida State University</u> was sued by two students assisted by the NFB. Without admitting liability or wrongdoing, the university paid each of the students \$75,000 to settle and agreed to examine technology-based instructional materials for accessibility compliance and ensure accessibility in future software and hardware procurements.

Providing IT accessibility to disabled students doesn't have to play out this way, and it certainly doesn't need to end up in court. Accessibility leaders point to three key elements that will allow institutions to take a more proactive approach to IT accessibility on campus:

- Building accessibility considerations into the IT procurement process
- Developing tools and training to help faculty ensure that course content is accessible
- Taking systemwide, long-term approaches to developing and sharing best practices

Waiting for Justice

Considering the legal risks schools face in not making IT accessible to disabled students, why would university officials hesitate? They may be waiting for clarity from the <u>US Department of</u> <u>Justice</u> (DOJ), which has issued an "advance notice of proposed rulemaking" on web accessibility, signaling that it will amend the <u>Americans With Disabilities Act</u> by regulating this topic sometime in the future.

Attorneys may be advising provosts and presidents to wait until the DOJ acts, explains Cyndi Rowland, director of the <u>National Center on Disability Access to Education</u> at the <u>Center for</u> <u>Persons with Disabilities</u> at <u>Utah State University</u>. "We're in a transition period," she adds. "When the DOJ rule does arrive, you will see a lot of action."

Rowland also believes some administrators feel more vulnerable if they announce publicly that they are working on accessibility issues, because it calls attention to the fact that they are not there yet. But as long as universities have an active transition plan in place, she says, disability rights advocates are not likely to target them. "The National Federation of the Blind is not going to go after people working hard on this issue," she says. "They are going after people who are digging in their heels and saying, 'What I am doing is allowable under the law.'"

Procurement Standards

At this point, relatively few institutions build accessibility requirements into their IT procurement standards. "If anything, it is incidental," says Rowland. "That would never happen with vendors' claims about security. Those are checked out closely."

One exception is NCSU. By university regulation, every IT product is evaluated for accessibility--one of several business issues the school considers. The more people who will be affected by a product, the higher the priority given to accessibility, so something like an LMS is examined very carefully.

Most vendors fill out a standard <u>VPAT (Voluntary Product Accessibility Template) form</u> (from the US Department of State) to address potential issues. But Kraus says he would never rely on VPAT forms alone. "They can be a starting point, but they are self-disclosing and not independently verified," he explains. "I always want to get my hands on the product and do my own testing."

Kraus recently reviewed products from three companies vying for a software contract that will impact NCSU's entire student body. He started with the VPATs and vendor-provided documentation, and then did additional research online. "I checked the web and any forums on assistive technology to see if [the products] are mentioned," he says. "I then ran my own tests using various assistive technologies such as screen readers. Those tend to stand out as the biggest problem."

All three products had a basic level of accessibility, but option A was heads and tails above the other two. "Options B and C weren't impossible for us," he says, "but the procurement team would have to make a strong business case for why they are better than A to overrule its strengths on accessibility."

Sharing Resources to Help Smaller Schools

<u>George Mason University</u>, the largest public university in Virginia, has a five-person office working on IT accessibility. But small schools such as the <u>University of Mary Washington</u> (VA) don't have the same level of resources. Although they do employ disability services employees, they may not be IT experts. Recently Kara Zirkle, IT accessibility coordinator at GMU, has been collaborating with Courtney Shewak, assistant director of disability services at UMW, on a new approach. "Our idea is to use the resources we have here at George Mason to help smaller schools," Zirkle says.

They are revamping a consortium called <u>Virginia Higher Education Assistive Technology</u> to share resources around issues such as captioning. "We use <u>Docsoft</u> to upload videos and automatically create transcripts, and we pay graduate students to edit them," Zirkle explains. "We are looking at a statewide software license that will allow other schools to upload their files to our servers and have their grad students do the editing."

Whenever Zirkle attends a conference on accessible technology, someone from a small college inevitably complains about having been appointed the school's accessibility point person without really knowing what to do. "We want to help people like that in Virginia with best practices," she says, "and give them some support."

Designing Accessible Courses

In the early days of online learning, recalls Utah State's Rowland, a course was either wholly good or horrendous for disabled students, based upon the effort of one person: the instructor. "Now we have a mulligan stew" of elements, some of which may be more problematic than others for the disabled, she says.

For example, as Colyer Graham noted in a <u>blog post</u>, a typical Penn State online course might include many of the following components:

- Original content created by a Penn State faculty member, generally consisting of text, images, audio, video, and other items in numerous file formats
- Library articles provided online
- Links to third-party copyrighted resources such as articles, YouTube clips, and videos in a host of formats
- Third-party copyrighted resources provided under fair use or TEACH Act provisions
- One or more textbooks, with supplemental online or other resources
- An LMS that provides tools such as e-mail, drop boxes, quizzing functions, gradebooks, and discussion boards
- Additional systems for interaction such as wikis, blogs, Twitter, and Facebook
- Real-time desktop computer conferencing tools
- Third-party software, such as Excel

Every student must be able to use these tools to access course content and resources, submit assignments and activities, and interact with other students and the instructor, Colyer Graham says. Her primary goal is to convince faculty members to be proactive about working through accessibility problems.

"It is a real challenge to get 3,000 faculty members trained on this," adds Rowland. "You can't very easily set up a regime to vet every course's online material up front." Though well intentioned, such

monitoring can generate tremendous blowback if it doesn't fit into faculty work processes. "When you set up these projects, you have to have all the stakeholders involved, not just accessibility advocates," she notes.

Penn State is creating a faculty-development module to help instructors with common scenarios involving students with visual and audio impairment issues. And all across the Penn State system, there are small teams helping faculty develop online courses--in some cases, accessibility is baked into course design.

In addition, every budgetary area at the university has a web liaison for accessibility. "I go to meetings and help developers design for accessibility," Colyer Graham says. "Often, it's not that they are reluctant--they are *unaware* of accessibility design issues."

While making course content accessible can be expensive, tweaking a web page or Word document costs next to nothing. For instance, Rowland's office has developed a list of common blockers for screen readers: web pages without a title; pages without heading elements; lack of link element text or titles; lack of form element labels; lack of captions for table data; tables that do not contain a header row and column where needed; and images without alt tags. (To learn more about the top blockers for the blind, visit the <u>Penn State accessibility website</u> and review the section titled Top Blockers.)

Rowland's organization also has funding from the US Department of Education for an ongoing project called <u>GOALS</u> (Gaining Online Accessible Learning through Self-Study), in which universities benchmark their own programs and develop plans to improve accessibility. Ten universities are currently in the self-study process, and Rowland expects at least another 10 to join by the end of the year. "The schools in the project are working on cost-case studies for captioning, procurement policies, and training faculty."

And, although captioning can cost a lot of money, university systems are finding efficiencies there, too. "The <u>California State University</u> system has created a captioning pool for all 23 campuses with a better pricing structure than [if it had gone] to outside vendors," explains Rowland.

A Systemwide Approach

Launched in 2006, the CSU system's Accessible Technology Initiative represents an executive-level commitment to promote equal access systemwide, says Cheryl Pruitt, ATI's director. The initiative brought together accessibility experts to help campuses establish a set of goals and deadlines for making improvements. Each university president appointed an executive sponsor to maintain high-level support for the project at all CSU campuses.

As the campuses work toward accomplishing the ATI goals, the system office has established communities of practice to share problems and solutions. Although accessibility improvements have been made across the CSU campuses, Pruitt admits the challenge was much greater than initially anticipated. "In 2009, we realized that we needed to shift our focus from targeting short-term deadlines to implementing a continuous process-improvement approach that integrates accessibility into all our business practices and procedures," she explains.

For the past few years, ATI has been working on a "Roadmap for Accessibility in Postsecondary Institutions" for CSU to use within its system and ultimately to share with other institutions. The map establishes a yearly cycle that includes developing a campus plan, implementing projects at both the campus and system level to institutionalize accessibility, and performing a campus self-assessment to measure progress. In the past year, CSU has also established the CSU Accessible Technology Network, which provides shared services in several areas of accessibility. This approach allows CSU to develop solutions once and then share them across all campuses.

"One especially successful project is our Web Accessibility Evaluation Process project," Pruitt notes. As part of that effort, nearly all CSU campuses participated in a contract to purchase <u>HiSoftware's</u> <u>Compliance Sheriff</u> web-evaluation tool, which resulted in significant cost savings. Two CSU campuses, <u>Cal State Northridge</u> and <u>Cal Poly San Luis Obispo</u>, then worked with HiSoftware to develop a customized set of accessibility checkpoints based on Section 508 and the <u>Web Content</u> <u>Accessibility Guidelines from the World Wide Web Consortium</u>. These checkpoints, incorporating both automated and manual tests, provide a comprehensive and consistent web-evaluation process for the millions of web pages and thousands of web applications used by the CSU community.

To tackle the challenge of accessible instructional materials, CSU is also contracting for systemwide services as a way to reduce costs and complexity. For example, it signed a contract with <u>Automatic</u> <u>Sync Technologies</u> to caption course videos. "We are also piloting <u>RoboBraille</u>," Pruitt says, "which allows users to submit text materials and receive them back in a variety of accessible formats."

CSU's Accessibility Resources

- The <u>California State University</u> system has two resources for universal design materials: The <u>Universal Design for Learning Universe website</u>, operated by the Ensuring Access through Collaboration and Technology grant at <u>Sonoma State University</u>, and the <u>Universal Design</u> <u>Center</u> at <u>Cal State Northridge</u>.
- As part of its systemwide Accessible Technology Initiative, CSU provides procedures, checklists, and other resources for meeting accessibility requirements in procurement, available at the <u>CSU Accessible Electronic and Information Technology Procurement website</u>.

About the Author

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