

DIGITAL ACCESSIBILITY PROCEDURE MANUAL

Attachment to Policy E-XV: Digital Accessibility Policy

INTRODUCTION

The purpose of these procedures is to provide processes by which McLennan Community College administrators, faculty, and staff will create, obtain, and maintain all electronic and information technology that ensures they are accessible to individuals with disabilities.

According to the Office of Civil Rights and our McLennan Community College's Digital Accessibility Policy, a person with a disability must be able to acquire the same information, engage in the same interactions, enjoy the same services as a person without a disability, and be able to do so in an equally effective manner, with substantially equivalent ease of use. Information and services must be made available at the same time to a person with a disability as to a person without a disability.

To help satisfy the requirement to comply with the ADA and meet MCC's Digital Accessibility Policy, our resources (website, media, or application) should be functionally accessible, rather than merely technically accessible. Technical accessibility determines whether a resource is coded to an accepted accessibility standard. However, functional accessibility means any person can use the resource effectively to perform an available task and that content is clear and unambiguous for all users, regardless of ability.

To be functionally accessible, your web resource must consider use by people who may:

- have severe or moderate visual impairment;
- be colorblind;
- be deaf or hard of hearing;
- have motor disabilities; and/or
- have cognitive disabilities.

ACCESSIBILITY STANDARDS:

This procedure manual is implemented in accordance with:

- The Rehabilitation Act of 1973 (Section 504 and 508) as amended;
- Title II of the Americans with Disabilities Act (Title II);
- Access Board Standards and Guidelines; and
- The World Wide Web Consortium (W3C) "Web Content Accessibility Guidelines" (WCAG) 2.1, level A and AA.

ROLES AND RESPONSIBILITIES

A. College Responsibilities

- The College will provide the necessary technology and support to assist faculty in the creation and revision of compliant and accessible courses.
- The College will review all course digital information including web enhanced, online, blended, and hybrid courses every five years for ADA compliance and accessibility.

- The College will provide training on creating ADA compliance and accessibility courses to all faculty.
- The College will ensure all faculty complete the ADA Compliance and Accessibility course every three years or as technology and regulations change.

B. Faculty

- Faculty must make reasonable accommodations as assigned by the Accommodations Coordinator. While it is the instructor's responsibility to ensure the learning environment is accessible, students must formally request accommodations, when needed. (Instructor Plans direct students with disabilities to the College resources and procedures used to request accommodations.)
- The faculty member can confirm a student's request for accommodations by reviewing their class roster and ask for clarification about a specific accommodation with the Accommodations Coordinator, but cannot challenge the legitimacy of a student's disability, review a student's documentation, nor refuse to provide an approved accommodation for a documented disability. However, faculty can deny a request for accommodations if the student and their accommodation has not been approved through the Accommodations Coordinator.
- In certain situations, reasonable accommodations may require changes to standard classroom approaches, but not fundamental alterations of the course. The following are examples of accommodations which may be necessary to ensure equal access to education:
 - Provide necessary accommodations for exams or provide the exam through the Testing Center, following Testing Center guidelines, where the student can receive the accommodations needed.
 - Provide alternative ways to fulfill course requirements while maintaining course integrity. i.e. Provide handouts, videos and other course materials in accessible formats upon request.
 - Allow assistive technology such as audio recorders, electronic note takers, and laptop computers to be used in the classroom.
 - Consider alternate ways of assessing students that allows the student's academic abilities to be measured and not their disabilities.
- Confidentiality in the accommodation process must be maintained by all parties. Information or notification of a student's accommodations should be kept private, and faculty should refrain from discussing students' disabilities and necessary accommodations with others who do not have an "educational need to know."
- The Accommodations Coordinator is available to serve as a resource for faculty seeking assistance in providing accommodations to students and welcomes your questions.
- Faculty have the right to award grades appropriate to the level of the student's demonstration of mastery of material.

- Faculty should understand the laws and college's guidelines regarding students with disabilities and refer students to Accommodations (Disability Services) when necessary.

C. Accommodations Coordinator Role

- Assist students regarding educational and disability accommodations issues applicable under federal law.
- Collect and evaluate educational, psychological, medical, and vocational diagnostic information provided by the student to determine eligibility for accommodations.
- Advise students regarding appropriate individualized, reasonable educational accommodations.
- Arrange for appropriate and reasonable accommodations;
- Assist students in accessing technology available to address their identified accommodation needs.
- Educate students about student rights and responsibilities, including self-advocacy.
- Work with faculty and students on developing ways to deliver accommodations.
- Provide faculty with professional development on various topics such as ADA and accommodations.

D. Procurement

- Procurement policies for accessibility of electronic information resources (EIR) are governed by the following Texas Statutes and Rules that relate to Higher Ed institutions:
 - Texas Government Code - § 2054 Subchapter M
 - Texas Administrative Codes - § 1 TAC 206: State Websites and § 1 TAC 213: Electronic and Information Resources
- These rules are meant to ensure people with disabilities can perceive, understand, navigate, and interact with the electronic and information resources, including hardware and software. A first step is to determine if these rules apply to the procurement situation by asking if it is possible or likely the public, students, faculty, or staff with disabilities would use or interact with the item or service being procured. If so, the EIR Accessibility Committee would determine if EIR procurement applies. The following are some common case examples that would apply:
 - Software used on the institution's public-facing website.
 - Software used by employees in the performance of their work.
 - Copy machines or other hardware which will be used by the public, students, faculty, or staff.
 - Classroom teaching podiums or furniture which may be used by those with disabilities.

- Services to develop EIR resources used by the public, students, faculty, or staff.
- Externally hosted websites or services used by the public, students, faculty, or staff.
- As with most procurements, product specs, scope of work, terms and conditions would be researched. However, if the procurement has been determined to fit into the EIR standards, then additional research will be needed to determine the accessibility of available products, including the request for and review of the products Voluntary Product Accessibility Templates (VPAT). The Procurement Office and Requesting Program will collaborate on the reviews and then generate an RFP which includes the accessibility requirements needed for final approval from the EIR Accessibility Committee.
- RFP responses are evaluated by the EIR Accessibility Committee and the Requesting Program based upon the following:
 - Accessibility testing of the product to validate the VPAT provided.
 - Accessing the risk of deployment of non-compliant solutions.
 - Asking for a remediation plan from the vendor as to when they will be compliant.
 - A recommendation as to the best solution for accessibility to the program. (See exceptions below.)
- If all parties are in agreement then a contract will be offered for the product or service.
- Per 1 TAC 213, exceptions or exemptions can be made based upon the best fit of the product, service, or the needs of the institution if approved by the President with the following stipulations:
 - Determining whether compliance with a provision of EIR accessibility law or administrative rules imposes a significant difficulty or expense on the agency or institution.
 - Individuals with disabilities can be provided an alternate method of access.
 - Any exceptions will need to be documented using this Exceptions Form.

E. Electronic and Informational Resource (EIR) Accessibility Committee

In compliance with 1 TAC 213.41, four-year institutions of higher education must designate an EIR Coordinator, however two-year institutions are exempt to this stipulation (Sec. 2054.0075). MCC believes accessibility is important to the college community as a whole and has designated an EIR Committee to facilitate institution-wide EIR accessibility compliance and practices in support of the institution's internal accessibility policy. The EIR committee consists of an individual from Accommodations, Procurement, Information System and Services, Marketing and Communication, and the Center for Teaching and Learning. The EIR Accessibility Committee should:

- Recommend best practices for EIR accessibility for new and existing technologies
- Identify and provide advice for EIR accessibility criteria and tools

- Facilitate the EIR accessibility exceptions process
- Ensure accessibility requirements are incorporated into EIR procurement processes
- Plan, monitor, and coordinate EIR accessibility activities
- Develop EIR accessibility strategies and implementation plans
- Develop and maintain policies, procedures, guidelines, and tools that meet the requirements of 1 TAC 206, 1 TAC 213, and TGC 2054.451
- Work with staff to develop compliance plans, corrective action plans, and resolve EIR accessibility issues, such as inaccessible websites
- Develop and implement processes for the public and employees to report EIR accessibility issues
- Report EIR accessibility status and progress to management and conduct studies and research projects as needed
- Build support for EIR accessibility among employees and stakeholders through presentations, training facilitation, and consultation on accessibility-related topics
- Identifies EIR accessibility training needs and develops training plans to meet those needs

F. Accessibility for Online Courses

Area	Implementations	Status
Course Layout	<ul style="list-style-type: none"> • Do not contain images (.jpg, .gif, .png, etc.) of text-based documents within a course. All documents, including pdf documents, must be readable by a screen reader. You should be able to highlight individual text in the document, not only entire blocks. This is what is meant by a document being “OCR’d.” 	Required
	<ul style="list-style-type: none"> • All courses must contain a logical, consistent, and straightforward layout. This includes a logical order for the Course Menu. • The course is easy to navigate (consistent color scheme and icon layout, related content organized together, self-evident titles). 	Recommended

G. Accessibility for Digital Content

	Implementations	Status
Text	<ul style="list-style-type: none"> Built-in Heading levels are used for formatting text on pages. No blinking or animated text. There must be contrast between the text and background. 	Required
	<ul style="list-style-type: none"> It is suggested that simple, sans-serif fonts (i.e. Arial, Calibri, Helvetica) are used with a size of at least 12 point font. Text color is used sparingly. When indicating an action, prompting a response, or distinguishing a visual element the use of text color should be used in conjunction with another visual change such as bold, underline, or font change (italics is not recommended). Bulleted and numbered lists should be used to break up large blocks of text. 	Recommended
Links	<ul style="list-style-type: none"> Links should be descriptive to indicate the URLs destination/purpose since phrases such as "click here," "more," and "click for details," are ambiguous when read out of context. 	Required
	<ul style="list-style-type: none"> The text for links should be kept to a minimum. Short URLs are acceptable, but avoid longer URLs which could be overwhelming. Avoids using URLs with combinations of numbers, letters, ampersands, dashes, underscores, and other characters. Links should use the underlining convention. 	Recommended

Tables	<ul style="list-style-type: none"> • Simple tables can be used, without merged or split cells. • Defined header rows. • Add table captions which describe the purpose of the table. • Do not contain blank rows, columns, or cells. 	Required
Images	<ul style="list-style-type: none"> • Decorative images are marked as such; if HTML, input an empty set of quotes as the alt text (alt=""). 	Required
	<ul style="list-style-type: none"> • Alternative text is added to images, tables, shapes, and other objects. • Images with specific functions (buttons, thumbnails etc.), contain alternative text that describes what the button will do when selected, such as Search, Submit, Place Your Order, etc. 	Recommended
Audio and Video	<ul style="list-style-type: none"> • All videos are captioned. • Audio files contain associated transcripts. 	Required
	<ul style="list-style-type: none"> • Audio descriptions should be used for elements in the video files that an individual with a visual disability would not be able to see. 	Recommended
Microsoft Office	<ul style="list-style-type: none"> • <u>Make your Word documents and PowerPoint presentations accessible to people with disabilities.</u> • <u>Create accessible PDFs using Adobe Pro in MS Office and use the export feature if the plug-in is not available.</u> 	Required
	<ul style="list-style-type: none"> • <u>Improve accessibility with the Accessibility Checker.</u> 	Recommended