# EITA Policy and Procedures

[Policy](http://www.bigbend.edu/accessibility/electronic-and-information-technology-access-policy/)

Big Bend Community College provides equal opportunity to its educational and administrative services, programs, and activities in accordance with federal and state law. This policy extends to the College's electronic and information technologies and applies to their procurement, development, implementation and ongoing maintenance.

Ensuring equal and effective electronic and information technology access (EITA) is the responsibility of all College administrators, faculty, and staff.

This is in accordance with federal and state laws including the Americans with Disabilities Act of 1990 (ADA), and the Amendments Act of 2008, and Section 504 of the Rehabilitation Act of 1973, and Washington State Policy #188.

# Procedures﻿

## Purpose

The purpose of these procedures is to provide processes by which College administrators, faculty, and staff will create, obtain and maintain all electronic and information technology (EIT) in a manner that ensures that EIT is accessible to individuals with disabilities.

These procedures apply to the following areas:

* [Web Accessibility](#1. Web Accessibility)
* [Instructional Materials Accessibility](#2. Instructional Materials Accessibility)
* [Document Accessibility](#3. Document Accessibility)
* [Electronic Media Accessibility](#4. Electronic Media Accessibility)
* [Software, Hardware and Systems Accessibility](#5. Software, Hardware and Systems Accessibility)
* [Procurement](#6. Procurement)

## Definitions

"**Accessible**" means that individuals with disabilities are able to independently acquire the same information, engage in the same interactions, and enjoy the same services within the same timeframe as individuals without disabilities, with substantially equivalent ease of use.

"**Disability**" means a physical or mental impairment that substantially limits one or more major life activities.

"**Electronic and information technology**" or "**EIT**" includes 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. The term electronic and information technology includes, but is not limited to, the internet and intranet websites, content delivered in digital form, electronic books and electronic book reading systems, search engines and databases, learning management systems, classroom technology and multimedia, personal response systems ("clickers"), and office equipment such as classroom podiums, copiers and fax machines.  It also includes any equipment or interconnected system or subsystem of equipment that is used in the automatic acquisition, creation, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information.  This term includes telecommunication products (such as telephones), information kiosks, Automated Teller Machines (ATMs) transaction machines, computers, ancillary equipment, software, firmware and similar procedures, services (including support services), and related resources.

"**Equally effective**" means that the alternative format or medium communicates the same information in as timely a fashion as does the original format or medium.

"**Legacy websites**" are College Program and Department websites published before January 1st, 2017.

**“Provisional Use Waiver”** is used to document an EIT resource that is scheduled to be replaced, retired or is temporary in nature and does not impede individuals with disabilities.

"**Universal design"** refers to broad-spectrum ideas meant to produce buildings, products, environments and digital assets that are inherently accessible to older people, people without disabilities, and people with disabilities.

"**VPAT (Voluntary Product Accessibility Template)” is a document which indicates compliance with Section 508 accessibility guidelines. It was developed by the Information Technology Industry Council and the Government Services Administration to assist with federal procurement practices. For more information on the VPAT, see the** [U.S. Dept of State VPAT Policy & Information document](http://www.state.gov/documents/organization/126552.pdf)**.**

## 1. Web Accessibility﻿

### 1.1 Scope

These procedures apply to all College Web pages and programs used to conduct College business and activities including web resources used in courses.

### 1.2 Standards

All web pages, websites and web-based software published, hosted or used (including remotely hosted sites and software) by the College will meet the standards and guidelines outlined in the Web Content Accessibility Guidelines (WCAG) 2.0 (<http://www.w3.org/TR/wcag2ict/>) published by the W3C as follows.  All pages will meet Level AA guidelines with limited exceptions.  All College websites, unless technically impossible, will link to the College's main [Accessibility](http://www.bigbend.edu/accessibility/) page which includes a statement of commitment to Web accessibility.

### 1.3 Responsibility

#### All Departments and programs:

* Will comply with the web accessibility standards when creating web content, sites, and programs.
* Will ensure that online activities are hosted in accessible environments and that online content follows standards outlined by this policy.

#### Public Information Office (PIO):

* Will provide instruction and support for campus community members creating BBCC web pages and content so that individuals who author web content can be trained according to these standards.
* Will ensure that any Content Management System and other web production or web object creation software proposed and supported by the Public Information Office will be accessible and will produce accessible Web pages.
* Will ensure that support is available for staff for creating accessible BBCC web pages and content.

#### EITA Coordinator and Working Group:

* Will coordinate instruction and support for campus community members creating BBCC websites, pages and content so that individuals who author web content will do so in accordance with WCAG 2 Guidelines AA Standards.
* Will compile and maintain data to track compliance with the policy and procedures and make recommendations for addressing problems.

### 1.4 Implementation Schedule Summary

* By **08/31/2017**, the College will identify a strategy to ensure that webpages that provide essential student functions are accessible.
* By **6/30/2017**, all College Program and Department websites, including legacy pages, unless technically impossible, will contain a clear statement (or a link to a statement) describing the College's commitment to web accessibility and a method to report barriers and/or to receive an alternative equally effective accessible format.
* By **12/31/2019**, all webpages published or hosted by the College on or after **08/12/2015**, will be accessible according to WCAG 2.0 Level AA standard.
* Upon a specific request for access by an individual with a disability, the College will update legacy pages to be in compliance with the WCAG 2.0 Level AA standard, as set forth in [Appendix A to this Agreement](#_Appendix_A:_Required), or the College will otherwise make the content available to the individual in a timely manner and in an equally effective accessible format.

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## 2. Instructional Materials Accessibility﻿

### 2.1 Scope

These procedures apply to all electronic instructional materials (syllabi, textbooks, presentations, handouts, etc.).  This includes electronic instructional materials delivered within the College's learning management system, in face-to-face classes, or in an alternate fashion (email, blogs, etc.) and electronic instructional activities (online collaborative writing, web conferencing, etc.).

### 2.2 Standards

All electronic instructional materials, optional and required, will be accessible and as effective and useable for persons with disabilities as they are for persons without disabilities. Instructional materials and activities will be made available to all students at the same time.

All instructional materials must meet all applicable standards and guidelines outlined in this policy.

### 2.3 Responsibility

#### All Departments and programs:

* Will ensure that instructional materials comply with all requirements outlined in these procedures.
* Will ensure that departmentally owned classrooms use and deliver accessible electronic and information technology.
* Will ensure that all departmental computer labs provided for student use will have assistive technologies not limited too but including accessible computer stations, screen reading software, and screen magnification.
* Will ensure that all applications developed on campus (web, desktop, etc.) are accessible according to principles of WCAG 2.0 AA level, WAI-Aria 1.0, and ATAG 2.0 standards (extrapolated as needed for non-web environments).

#### Faculty and instructional staff:

* Will create and present accessible courses and instructional material.

#### eLearning

* Will facilitate hosting of online activities in an accessible learning management system and related hosted systems (such as web conferencing).
* Will provide instruction and support for campus community members creating online courses and online instructional content.

#### Big Bend Technology (BBT):

* Will use accessible electronic and information technology in IT-designed and supported Technology Classrooms.
* Will monitor informational IT-web pages and appraise the EITA-recommended lab software and procedures found on those pages for priority use in cases where it meets the business requirements of the college and its students as defined in sections [5.4](#_5.4a_Software_Implementation)(b) and [6.4](#_6.4_Implementation_Schedule) of this document.
* Will coordinate support for distributed IT and campus units needing assistance with accessibility in departmentally supported technology classrooms.

#### William C. Bonaudi Library:

* Will maintain an accessible website (http://libguides.bigbend.edu/) and implement a search engine that will provide equal access to its records.
* Will conduct quarterly accessibility scans to ascertain whether any posted content is inaccessible.
* Will actively work to ensure all resources it provides are as accessible as possible.

#### EITA Coordinator and Accessible Technology Team (ATT):

* Will compile and maintain data in a living document to track compliance with the policy and procedures and make recommendations for addressing problems.
* EITA Coordinator and The Accessible Technology Team will serve as a clearinghouse for information about assistive technology and modifications recommended for departmental computer labs.

### 2.4 Implementation Schedule Summary

* By **[MM/DD/YYYY]**, the College will identify its strategy to ensure the ongoing accessibility of its learning management systems.
* By **[MM/DD/YYYY]**, the College's library website will be accessible in accordance with WCAG 2.0 Level AA standard, as set forth in Appendix A of the Resolution Agreement.
* By **[MM/DD/YYYY]**, the College will implement a program to provide information, education, and support for ensuring that EIT used in classrooms (including, but not limited to, clickers, podiums, blogs, and other software) is accessible.
* By **[MM/DD/YYYY]**, the William C. Bonaudi Library will implement a search engine that is accessible in accordance with WCAG 2.0 Level AA standard, as set forth in Appendix A to this Agreement. This search engine will provide equal access to its records.
* By **[MM/DD/YYYY]**,: Campus labs will meet EITA recommended installations and procedures listed on IT web pages.

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## 3. Document Accessibility﻿

### 3.1 Scope

These procedures apply to all College-produced and maintained or distributed electronic documents.  Electronic documents include, but are not limited to, word processing documents, PDFs, presentations, publications and spreadsheets which are scanned, uploaded, posted, or otherwise published or distributed electronically.  Legacy documents must be made accessible when used.

### 3.2 Standards

Electronic documents must be accessible.  Electronic interaction with College policies, procedures, notifications and other documents must be as effective and useable for persons with disabilities as it is for persons without disabilities.

Accessible electronic document types are listed on the [BBCC Accessibility web page](http://www.bigbend.edu/accessibility).

Electronic documents must meet the standards and guidelines outlined in the [Guidance on Applying WCAG 2.0 to Non-Web Information and Communications Technologies](http://www.w3.org/TR/wcag2ict/), published by the W3C as the Working Draft 13 December 2012.

Electronic documents and printed materials should include one of the following Accommodation Statements:

* **Abbreviated Accommodation Statement**
(Bare Minimum for Posters/Flyers)
Persons with disabilities who anticipate needing accommodations or who have questions about physical access may call (telephone number of the event coordinator) in advance of the program (or film, event, etc.).
* **Fuller Accommodation Statement**
(This statement should be printed in any publication that describes a specific program or special event, e.g., seminar, film, speaker, performing arts series, employment programming, etc.)
Big Bend Community College encourages persons with disabilities to participate in its programs and activities. If you anticipate needing any type of accommodation or have questions about the physical access provided, please call (telephone number of the event coordinator) in advance of your participation or visit.
* **FULL Document Accommodation Statement**
(This statement should be used in timeless documents, that are not subject to frequent change, such as MCOs)
If the format of any material in this document interferes with your ability to access the information, please e-mail us at accessibility@bigbend.edu, call us at 509-793-2222 or write to us at: Accessible Technology Team, Big Bend Community College, 7662 Chanute Street N.E., Moses Lake, WA 98837, ATTN.: Jeremy Seda

### 3.3 Responsibility

#### All Departments, Programs, and College Employees:

* Will follow the accessibility requirements outlined in these procedures when creating and using electronic documents.
* Will provide accessible document instruction and support for campus community members.

#### William C. Bonaudi Library:

The William C. Bonaudi Library will implement procedures for ensuring that materials digitized or hosted by the library for research purposes are accessible to individuals with disabilities.

#### EITA Coordinator and Accessible Technology Team:

* Will compile and maintain data to track compliance with these procedures and make recommendations for addressing problems.
* Will work with BBT, DSS, William C. Bonaudi Library and PIO to coordinate campus-wide PDF solutions.

### 3.4 Implementation Plan Summary

* By **[MM/DD/YYYY]**, all straight-text documents (including PDF, Word, Excel and PowerPoint files) will be accessible.
* By **[MM/DD/YYYY]**, create a working group to address: 1) accessible historical documents and 2) accessible documents from campus publications.
* By **[MM/DD/YYYY]**, strategies developed for producing accessible historical documents and accessible documents from publications.

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## 4. Electronic Media Accessibility﻿

All departments will purchase and produce only accessible multimedia and update existing inaccessible media as it is put into use.

### 4.1 Scope

All media resources used in College programs and activities must be accessible. For example, this includes, but is not limited to, media that is instructional, informational, marketing, and promotional.

### 4.2 Standards

Video media resources will be closed-captioned and audio-described and audio resources will be transcribed.

### 4.3 Responsibility

All departments, programs, instructors and employees:

* Will purchase only captioned versions of audiovisual media whenever possible.  Will ensure that all other media that will be used on the web or in instruction is captioned.
* Will purchase only transcribed audio and audio-described versions of audiovisual media whenever possible.
* Will update any non-transcribed audio and any non-captioned/non-described video that is in current use.
* Will use only transcribed audio and closed-captioned media with audio-descriptions that are made available in a timely manner to the class and will only assign such media as course material, whether optional or required.

#### William C. Bonaudi Library:

* Will work with faculty, staff, and students as needed to transcribe audio and caption video resources pursuant to copyright laws.
* Will assist faculty identify materials that are captioned prior to purchase.

#### HR:

* Will incorporate captioning and media accessibility information into training.

#### BBT:

* Will ensure classroom and presentation equipment is caption-compatible and the default on all TVs, etc. as defined in section [5.4](#_5.4b_Hardware_Implementation)(b) and [6.4](#_6.4_Implementation_Schedule) of this document.
* Will maintain and continue to provide instructions on A/V media equipment for accessibility (such as captioning and audio-describing media and transcribing audio) as well as how to show captioned media in classrooms.
* Will incorporate into faculty training on A/V equipment information about accessibility.

#### Public Information Office:

* Will produce only new communications and promotional materials that are captioned, audio-described or transcribed.

#### EITA Coordinator and Accessible Technology Team:

* Will coordinate campus-wide captioning and transcribing solutions that:
	+ Provide assistance with obtaining permission to caption and audio-describe.
	+ Disseminate information to the College community about College protocols related to accessible electronic media including a list of approved vendors to perform captioning.

### 4.4 Implementation Schedule Summary

* By **[MM/DD/YYYY]**: All videos (professionally or internally produced) used in courses and shared on campus websites or video storage sites (such as Panopto, Youtube,Vimeo, etc.) will be captioned according to recommended Described and Captioned Media Program (DCMP) standards.
* By **[MM/DD/YYYY]**: Students may request that recordings of course sessions and presentations created for and during a course, and in use only during that course, be captioned.
* By **[month, YYYY]**:  Assess Audio Description availability and create a plan toward audio description standards and for use on campus.   Audio Description videos will be acquired and created when technology permits.

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## 5. Software, Hardware and Systems Accessibility﻿

### 5.1 Scope

Software, hardware and systems purchased must be reviewed for accessibility and usability with accessible products.  Accessible, in this context, means compatible with assistive technology.   Examples of software, hardware and systems include, but are not limited to, learning and content management systems, library and email systems, and administrative management systems such as finance, registration and human resources, and all software, hardware and software services used for student services.  Software includes freeware, shareware, desktop, enterprise, subscription and remotely-hosted options.  Software that is accessed through a web-browser must also be accessible and is discussed under Section 1 of these procedures.

### 5.2 Standards

Big Bend Community College will use the following standards to determine accessibility:

[US Access Board’s Guide 508 Standards - Software Applications and Operating Systems](http://www.access-board.gov/sec508/guide/1194.21.htm)

#### All Departments and programs/College employees:

* Will ensure that their software, hardware, local interfaces and modifications and electronic systems are accessible.
* Will ensure that all applications developed on campus (web, desktop, etc.) are accessible according to principles of WCAG 2.0, WAI-Aria 1.0, and ATAG 2.0 standards (extrapolated as needed for non-web environments).

#### BBT:

* Will ensure that assistive technologies are available to students working in campus labs or on publically-accessed campus computers.
* Will ensure that assistive technologies are available in a timely manner for campus employees including student employees.

#### EITA Coordinator and Accessible Technology Team:

* Will coordinate campus processes for ensuring campus software, hardware and software system accessibility.

#### 5.4a Software Implementation Schedule Summary

* By **[MM/DD/YYYY]**:  Institute processes for purchase of only accessible EITs, except when it would fundamentally alter a program or when it is not technically feasible to do so and in such case the process will require the College to provide accessible alternate EITs.

#### 5.4b Hardware Implementation Schedule Summary

* By **[MM/DD/YYYY]**:  Reading systems and software that are used for textbook delivery should meet these guidelines: http://www.daisy.org/accessibility-screening-methodology-guidelines-and-checklist.html.
* By **[MM/DD/YYYY]**: Campus scanners will have an OCR profile/option.
* By **[MM/DD/YYYY]**: Accessible clickers will be selected.
* By the start of **[month, YYYY]**: Develop a strategy for review of academic and other hardware with the intent that only hardware with accessible options should be selected for use in academic courses and campus activities including such things as door swipes and educational technology.

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## 6. Procurement﻿

### 6.1 Scope

This process applies to all College purchases of Electronic and Information Technology (EIT) software, hardware and services.

### 6.2 Standards

All technology products or services purchased or utilized by the College will meet minimum accessibility requirements as per Federal and State regulations and policies. This includes products that are developed internally by College staff.

1. Ask bidders on technology products / projects to provide information about the accessibility of their products:
	1. Bidder must describe how their IT products or services are accessible.
	2. If there are issues that prevent bidder's product or service from meeting requirements, bidder must describe efforts underway to address issues, including anticipated timelines for completion.
2. Validate bidder information and evaluate products for accessibility:
	1. Vendors and developers will be required to submit a Voluntary Product Accessibility Template (VPAT), documenting the accessibility of a product in accordance with [Section 508 Standards of the Rehabilitation Act of 1973](https://www.section508.gov/content/learn/laws-and-policies).
	2. Products must also meet Level AA compliance with [Web Content Accessibility Guidelines](https://www.w3.org/WAI/intro/wcag) (WCAG) 2.0, in accordance with the [Washington State Office of the Chief Information Officer Policy 188](https://ocio.wa.gov/policy/accessibility).
	3. VPATs can be informative, but they have limitations because they are self-reported by vendors and, therefore, should be independently verified and not accepted at face value.
	4. Few technology products are fully accessible; however, vendors should, at a minimum, be willing to make a commitment to address accessibility problems.
3. Include accessibility assurances in contracts with vendors.

If the best product for the College's needs is one that fails to fully meet accessibility requirements, vendors will be asked to make a commitment to improving accessibility over a specified timeline.

The procurement contract will include language that specifically documents the agreement between vendor and procurer as to how satisfactory progress on accessibility will be measured.

Even if the product is currently accessible, the contract should include language that assures continued accessibility as the product is updated.

**Exemptions:**

When a VPAT or [WCAG 2.0](https://www.w3.org/WAI/intro/wcag) AA verification demonstrates a lack of accessibility, an exemption may be requested by the department or employee initiating the technology request. All exemption waiver requests must be approved by the [Washington State Office of the Chief Information Officer per Policy 188](https://ocio.wa.gov/policy/accessibility).

A written request for exemption may be made to the Accessible Technology Team following review and endorsement by the appropriate dean or director. Exemption requests should detail what specific accessibility requirements cannot be met by the technology product. The request should also detail why attempting to meet accessibility requirements would cause an undue hardship to college resources, employees, and / or students.

Requests should indicate other options or vendors considered and why they were not selected, along with how equivalent access will be granted to those with disabilities.

The final decision on exemptions will be made by the appropriate Vice President, who, in consultation with the Accessible Technology Team and BBT will evaluate the request based on the following criteria:

* What solutions are currently in place?
* Will the technology improve or hinder accessibility?
* What constituent groups will this service affect?
* Can accommodations be made to overcome barriers to accessibility or to provide equivalent access?

If an exemption is granted, the IT Accessibility Coordinator will help draft, coordinate and submit a [waiver request to the WA OCIO per policy 103 Technology Policy & Standards Waiver Request](https://ocio.wa.gov/policy/technology-policy-standards-waiver-request).

The coordinator will also notify the requestor of the final decision within 30 days of receiving the waiver from the WA OCIO.

BBT department will maintain documentation of all approved exemptions.

### 6.3 Responsibility

#### All Departments, Programs, and College Employees:

* Must purchase or otherwise acquire accessible EIT, in accordance with these procedures.

#### EITA Coordinator:

* Will serve as the liaison between Big Bend Community College and the Washington State Office of the Chief Information Officer on Exemptions pertaining to Policy 188.

#### BBT

* Maintains documentation of approved exemptions.

#### BBT and Business Office:

* Will serve as a resource for EIT purchases and other acquisitions for compliance with accessibility requirements.

#### Accessible Technology Team:

* Will provide written justification for all provisional use waivers and post such waivers on the accessibility web page.
* Will review requests for exceptions. If the request for exception is endorsed by the Accessible Technology Team, then this work group will help the requesting person or department in drafting, coordinating and submitting the exemption waiver request to the OCIO.

### 6.4 Implementation Schedule Summary

* **[MM/DD/YYYY]**, the College will develop and institute procedures that require the College to purchase or recommend only EITs that will provide the same programs, benefits, and services as they do to individuals without disabilities, except when it would fundamentally alter a program or when it is not technically feasible to do so, in which case the procedures will require the College to provide accessible alternate EITs.
* By **[MM/DD/YYYY]**, the College will implement as part of its request for proposal process a requirement that bidders meet the accessibility standards of WCAG 2.0 Level AA for web-based technology (as set forth in Appendix A to this Agreement) and Section 508 of the Rehabilitation Act and the Americans with Disabilities Act for other EITs; and requiring or encouraging, at the College's discretion, as part of any contract with its vendors, provisions in which the vendor warrants that any technology provided complies with these standards and any applicable current federal and state disability laws.

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**Appendix A: Required AA Standards**

[WCAG 2.0 Guidelines](http://www.w3.org/TR/WCAG20/#guidelines)

* + [1 Perceivable](http://www.w3.org/TR/WCAG20/#perceivable)
		- 1.1 [Provide text alternatives for any non-text content so that it can be changed into other forms people need, such as large print, braille, speech, symbols or simpler language.](http://www.w3.org/TR/WCAG20/#text-equiv)
		- 1.2 [Provide alternatives for time-based media.](http://www.w3.org/TR/WCAG20/#media-equiv)
		- 1.3 [Create content that can be presented in different ways (for example simpler layout) without losing information or structure.](http://www.w3.org/TR/WCAG20/#content-structure-separation)
		- 1.4 [Make it easier for users to see and hear content including separating foreground from background.](http://www.w3.org/TR/WCAG20/#visual-audio-contrast)
	+ [2 Operable](http://www.w3.org/TR/WCAG20/#operable)
		- 2.1 [Make all functionality available from a keyboard.](http://www.w3.org/TR/WCAG20/#keyboard-operation)
		- 2.2 [Provide users enough time to read and use content.](http://www.w3.org/TR/WCAG20/#time-limits)
		- 2.3 [Do not design content in a way that is known to cause seizures.](http://www.w3.org/TR/WCAG20/#seizure)
		- 2.4 [Provide ways to help users navigate, find content, and determine where they are.](http://www.w3.org/TR/WCAG20/#navigation-mechanisms)
	+ [3 Understandable](http://www.w3.org/TR/WCAG20/#understandable)
		- 3.1 [Make text content readable and understandable.](http://www.w3.org/TR/WCAG20/#meaning)
		- 3.2 [Make Web pages appear and operate in predictable ways.](http://www.w3.org/TR/WCAG20/#consistent-behavior)
		- 3.3 [Help users avoid and correct mistakes.](http://www.w3.org/TR/WCAG20/#minimize-error)
	+ [4 Robust](http://www.w3.org/TR/WCAG20/#robust)
		- 4.1 [Maximize compatibility with current and future user agents, including assistive technologies.](http://www.w3.org/TR/WCAG20/#ensure-compat)