

Tab 2

May 10, 2017

Study Session

# Committee for accessible technology oversight

## Brief description

The Committee for Accessible Technology Oversight (CATO) was formed in response to State Board approval of the Accessible Technology policy 30.20.30B. This policy supports efforts by the community and technical colleges in Washington State (CTC) in their obligation to provide equal, effective and meaningful access to educational technology for individuals with disabilities. CATO’s charge is to develop guidelines and provide ongoing advice and support to institutions and members of the Washington Community and Technical College system, promoting sustainable and proactive practices for the effective and integrated access by all members of our college communities to current, emerging, and future technologies in compliance with federal, state, and system laws and policies.

## How does this link to the State Board goals and policy focus

CATO’s charge contributes to the three State Board goals:

* **Promoting student achievement and success** by increasing the success of students with disabilities and the success of students overall in accordance with the principles of Universal Design for Learning (UDL);
* **Increasing access to post-secondary education** by removing barriers for students with disabilities;
* **Building on the system’s strengths and successes** by utilizing the expertise of accessible technology experts and advocates on CTC campuses and in SBCTC in coordinating work in the shared context of CTC system governance.

## Background information and analysis

CATO is comprised of representatives from the following Councils and Commissions: Disability Student Services Council, eLearning Council, Library Leadership Council, Public Information Commission, Instruction Commission, Student Services Commission, Research and Planning Commission, Faculty Association of Community and Technical Colleges, and Business Affairs Commission. CATO works through CTC governance by representatives presenting discussion and action items to their respective councils and commissions.

Over the course of the year, CATO has developed and distributed on-going webinars, sample policy language, a website that links to training resources and opportunities (managed by SBCTC eLearning) and has created a portal through which college staff may request help on accessibility issues.

CATO has also identified areas of significant risk the colleges face by compiling information gained from surveys, questions from college staff, and by studying recent legal findings against higher education institutions.

In addition, the recent approval of Policy 188 by the State of Washington Office of the Chief Information Officer (OCIO) and the implementation of new provisions under the United States Access Board’s refresh of Information and Communication Technology accessibility standards has conferred specific and time-sensitive obligations to make technology more accessible. Colleges have moved aggressively to address these obligations but additional system-wide coordination and resources are necessary for these efforts to succeed.

Areas of current risk and concern include:

* The need to develop and publish an inventory of accessible and inaccessible technologies;
* An increased obligation to distribute information, define responsibility, and provide training on technology accessibility for all areas and departments;
* A need to implement consistent and verified testing and evaluation of information technologies for accessibility;
* Time and effort to continuously monitor policy compliance efforts; and
* An obligation to develop, publish and implement policy and procedures for addressing accessibility as a requirement within college and statewide procurement.

In the face of these obligations, colleges are looking to SBCTC to provide resources, coordination and management of some of this work, especially in instances where technologies are shared or duplicated among colleges. Coordination by SBCTC could prevent redundancy of effort and result in the creation of shared system resources that could have the effect of reducing risk to the colleges. SBCTC’s role in managing core technologies such as cTcLink argues for an expanded role in this process.

The OCIO policy initially requires all state agencies to identify an IT Accessibility Coordinator, develop accessible technology policy and procedures, and publish a corrective action plan for inaccessible technologies. The subsequent and substantial work of compliance will be in executing those plans. The aggressive timeline of this policy and need for ongoing organizational practices that will result from compliance efforts has significantly altered the technology accessibility landscape in our State.

As a result, the issue currently facing CATO is how to best support the colleges given the increased urgency and requests for more directed leadership and coordination. We have discovered that colleges need leadership and coordinated technical support to mitigate some of the organizational impacts of this policy. Meeting this need would expand both CATO’s role and that of SBCTC in coordinating these compliance efforts.

To address compliance with both state and federal policies, the CTC system will need to plan for the following costs:

* Captioning all public facing and instructional videos;
* Procuring software/services to convert all inaccessible documents to accessible versions;
* Conducting system level procurement for website accessibility software;
* Conducting professional usability testing for current and future software, pursuant to OCIO Policy 188.

Based on savings achieved by other SBCTC-coordinated technology procurements, colleges believe that it would be more efficient to manage the acquisition and deployment of key products and services at the system-level. While this role is not specific to CATO, the committee would play a key role in identifying and analyzing needs for specific services and technologies and would function as a clearinghouse for discussions on how to best deploy these across the system.

## Potential questions

* How can CATO revise its work plan and reconfigure its membership to consolidate efforts on the State Board accessibility policy and those in service of the OCIO Policy 188?
* How can SBCTC staff and CATO best target needs, provide consultation, and support colleges with these paired implementation processes?
* How can CATO and SBCTC work together to minimize budgetary impacts of these efforts by sharing and coordinating technology testing and compliance tracking?

## Recommendation/preferred result

Staff recommends:

* Include support for OCIO Policy 188 compliance efforts within the CATO charge;
* Add and reconfigure CATO membership to support OCIO Policy 188 compliance as well as State Board Policy 30.20.30B. This would include adding college staff who do not directly staff CTC councils or commissions.
* Exploration of options for increased SBCTC participation in procuring and supporting Technology Accessibility services for use by colleges.

Policy Manual Change Yes [ ]  No [x]

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**Accessible Technology Policy:
Vision, Mission, Policy Statement & Recommendations for Adoption**

**Accessible Technology Task Force, May 2014**

**Overview**

This policy is established to support the community and technical colleges in Washington State (CTC) in their obligation to provide equal, effective, and meaningful access to the benefits of technology for individuals with disabilities. All CTCs are mandated to comply with the requirements of the Americans with Disabilities Act (ADA) and the Rehabilitation Act of 1973, Core Services legislation, RCW 28B.10.912 and the Washington State Law Against Discrimination, RCW 49.60 and any future legal mandates related to providing equal access to individuals with disabilities. Beyond these legal obligations, however, the SBCTC and its member colleges seek to create environments that allow for the full participation of their diverse communities.

In addition, it is recognized that accessibility is a system-wide responsibility and everyone within the system is responsible for ensuring access. Accessibility is to be addressed at the statewide system level, in institutions and by individuals.

The CTC community’s commitment to ensure access to electronic and information technology (EIT) will be met through the application of accessibility standards, guidelines, training, and a common understanding of these concepts as specified in the Department of Education’s June 29, 2010 on Electronic Book Readers. [Click here to access the Dear Colleague letter.](http://www2.ed.gov/about/offices/list/ocr/letters/colleague-20100629.html)

This document applies to all current and emerging technologies throughout the Washington Community and Technical College system.

**Definition**

The use of the term “accessibility” in this policy refers to the objective that everyone within the Washington State Community & Technical College system will have equally effective and equally integrated access to the benefits. “Effective” and “integrated” refer to our commitment to meet or exceed our legal obligations to provide an equivalent user experience in any and all cases where that is possible and reasonable.

**Vision**

Washington’s community and technical colleges are leaders in supporting (or addressing?) accessibility and ensuring that everyone within the SBCTC community has equally effective and integrated access to all the benefits of the college system. This includes the ability for students and members of the college community to access and use current, emerging, and future technologies.

**Mission**

The SBCTC is dedicated to supporting faculty, staff and administrators charged with all aspects of EIT access. This includes the procurement, adoption and implementation of new and emerging educational technologies. We support our entire community as they adjust and adapt to changes in technologies to support our students’ learning experiences and the educational community as a whole.

**Guidelines & Principles**

* Our outcome is based on input from all relevant stakeholders, including but not limited to disability services coordinators and students.
* All outcomes promote accessible design solutions as preferable to accommodations
* Compliance is a by-product of accessibility policy, not a primary goal.
* We stress Universal Design for Learners in settings where it most appropriate.
* Access is a discovery process on a case by case basis, not an ad hoc, reactive process.
* Accessibility is a responsive policy environment driven by changes in demographics, technologies, and legal requirements.
* Policy, funding and practice must assist and support everyone involved in the acquisition, development and use of learning technologies.
* Evolving practices and conversations about accessibility should be central to instruction and student service process and delivery.
* Accessibility is an evolving discipline of practice that requires working together to create a culture, philosophy and community of accessibility.

**Policy Statement**

Washington State Community & Technical colleges shall provide appropriate, effective, and integrated access to technology for students, employees and external community members.

This policy applies to the procurement, development and implementation of instructional, administrative or communications technologies and content. Further, the policy applies to both current and emerging technologies, including both hardware and software, in use or being evaluated for purchase or adoption throughout the Community and Technical college system. The policy encompasses but is not limited to college websites, learning management tools, student information systems, training materials, instructional materials and assessment tools.

**Recommendations**

1. SBCTC supports the new policy on accessible technology;
2. SBCTC & WACTC review and update existing policies on accessibility;
3. Given that legal analyses have identified that individuals, colleges, and the system can be held liable for failures to provide access, we recommend that the SBCTC ratifies this document and ensures that enforcement implementation occurs through a statewide implementation work group with representatives from BAC, eLearning, DSSC, WSSSC, IC, PIC, IT etc. to develop guidelines.
4. eLearning Council and individual colleges will provide professional development to staff/faculty so that appropriate access is provided to all users of technology.
5. Quarterly updates from a designated state group advise all SBCTC councils and commissions on matters of accessibility and technology. This group will support the creation of annual work plans and monitor progress on their achievement. The same group will be responsible for making recommendations, establishing guidelines and disseminating best practices for technology accessibility.
6. SBCTC will establish a cross-council online presence to capture recommendations, resources and educational materials.