February 9, 2017

Mr. Damon Bell

President, Washington State Student Services Commission

Vice President of Student Services, Olympic College

1600 Chester Avenue  
Bremerton, WA 98337-1699

Dear Mr. Bell:

The Disability Support Services Council is writing to call your attention and ask for the Commission’s partnership in addressing concerns about the inadequate accessibility of the current ctcLink PeopleSoft 8.54 software. It is inaccessible and not compatible for staff, students or faculty with disabilities using assistive technologies. These assistive technologies include screen readers, magnification software, and text to speech software. Based on feedback from the FirstLink colleges and accessibility testing done by Clark College (a Wave 1 college in an authorized sandbox), this impacts both the Campus Solutions and Human Capital Management pillars of PeopleSoft; we also assume it impacts Financial Management, but have not tested.

The state-wide system being implemented by SBCTC, ctcLink should be operationally designed in order to be in compliance with mandated requirements of Federal and state laws regarding information technologies, electronic content, and web accessibility. These include the following:

* SBCTC Policy 3.20.30B- Accessibility Technology Policy[[1]](#endnote-1)
* WaTech Policy 188 – Accessibility[[2]](#endnote-2)
* Sections 504 and 508 of the Rehabilitation Act, as it applies to electronic accessibility
* ADA, as it applies to electronic accessibility

The Disability Support Services Council is requesting the accessibility mode within an authorized sandbox be turned on immediately for Wave 1 colleges to include Clark College, Pierce District, Columbia Basin College, Lower Columbia College, Peninsula College and SBCTC. In addition, we request FirstLink colleges be given opportunity to test the accessibility mode in a measureable way with direct and consistent support from SBCTC to do so. FirstLink colleges include Tacoma Community College, Spokane Community College, and Spokane Falls Community College.

On behalf of DSS providers throughout the state, we look for support from the Commission with this request. FirstLink colleges’ have brought attention and awareness through individual tickets of concern around the inaccessibility of this product with requests made since 2016 for the accessibility mode to be turned on with temporary or unsuccessful results. This includes Clark College and their requests as recent as fall quarter 2016. Turning the accessibility mode on will allow these two groups of higher education institutions to test the usability of the accessibility mode, determine if the accessibility mode allows an accessible function for users with disabilities, and assess if the accessibility mode complies with the above state policies and accessibility standards those state policies reference of WCAG 2.0 Level AA[[3]](#endnote-3).

As a final point, we would like to note that although assurances were made on the confidentiality feature with disability screens FirstLink colleges have experienced this to not be the case. It is our recommendation that prior to any Go-Live dates disability screens are monitored to ensure restricted access only by authorized disability support service staff.

We thank you for your consideration and welcome the opportunity to discuss strategies and solutions.

Sincerely,

The 2016-2017 Disability Support Services Council Board

C/o

Jamie Hatleberg, Appointed President, Disability Support Services Council

Director Disability Support Services

Green River College

1. [http:/www.sbctc.edu/online-accessibility.aspx](http://www.sbctc.edu/online-accessibility.aspx) [↑](#endnote-ref-1)
2. <https://ocio.wa.gov/policy/accessibility?utm_medium=email&utm_source=govdelivery> [↑](#endnote-ref-2)
3. <http://www.w3.org/TR/WCAG20/>

   *Cc: Ruben Flores, SBCTC Liaison to DSSC and Kim Thompson, WSSSC Liaison to DSSC.*  [↑](#endnote-ref-3)