

SOFIA LEIVA: Thanks for joining this webinar entitled *Incorporating Accessibility Into the Procurement Process*. I'm Sofia Leiva from 3PlayMedia, and I'll be moderating today. And today, I'm joined by Kara Zirkle, Accessible Technology Specialist at Miami University. And with that, I'll hand it all over to Kara who has a wonderful presentation prepared for you all.

KARA ZIRKLE: And welcome, everyone. As I was introduced, I'm Kara Zirkle. I do work here at Miami University.

And one of the things that I have been working on the last year and a half here-- as well as some of the work I've done at George Mason University-- has been around procurement. It's become a popular topic. So looking at some of the common issues around that is where accessibility falls into play. And looking at those areas, we try to pull in where procurement actually applies.

So looking at the large list that we have, we often have learning management systems or something that's going to be used university-wide. We look at textbooks and the supplemental material of that. And sometimes, that doesn't necessarily fall into a procurement realm because the university is not purchasing it. But faculty are actually selecting those textbooks for the students to purchase.

Other times, we might be looking at services around document or video development, or even-- a lot of times we have library databases, and we'll talk a little bit more about those in depth. But these are just some of the different things about common issues, in general, around accessibility. Not specifically within procurement, but I always like to start with that so when we start talking about procurement, we can also talk more specialized within that aspect.

So when we look at the challenges around procurement, each and every one of us is going to have a different procurement workflow. And within that workflow, it might be different based upon the different size of colleges, whether it's a community college, whether it's private, four-year, if you have a law school versus a medical school. Each one of us are different.

So the complexity around that, how many different ways that something can be purchased, really does put a huge challenge on trying to design something when it comes to accessibility within procurement itself. Add to that how many purchases can actually come through that procurement request within a year's time. How do you really get a handle on that? Is it just you

doing accessibility? Is it more of a team in an office? Maybe it's just you happened to wear the lucky hat that month or that semester.

And really, looking at all of these things, it also looks at the lack of awareness. If you start to ask different departments that are purchasing things, what accessibility means, how many different answers are you going to get? Is it going to be an overall, general concept that everybody understands for it to be the same? So how we can actually play into that procurement process, as well.

And finally, really, the lack of resources. And we're all there, regardless of how single we might be, as a sole individual working on this, or even if you're a team. It doesn't matter because of the magnitude of purchases, and sometimes the complexity around that, we're always at lack of resources. So it is the nature of the beast.

So looking at some of the other challenges, one of the items we often see is open source. Because open source is free, how do you include it as part of the procurement process? Because anyone can use it at any given time. They can download it and add it to their university computers. So how do we really tackle this?

First and foremost, I do like to think working within the university policies or the procedures, looking at it from a security standpoint of do individuals have the administrative rights to be able to download iTunes to their computer? Because technically, looking at that license agreement, some schools or some individuals might not actually have the proper approval to actually be able to download that and use it within their computer, even though they have admin rights. And they're clicking through this quick, "yes, I approve and I agree" and it's downloaded. So looking at something along those lines within security sometimes helps with this.

But a great resource that really does walk you through the different theories and the ideas and the suggestions is one that I found from Mike Gillford. And the link is there. But I actually think that he really does do a lot of deep diving into this. So I try not to spend too much time on it because he's really done a good job with that and explaining that.

So looking at this, we try and start through the basics. So looking at these things, we really try to look at the stakeholder groups. If you do have that higher authority and you have that support, how is that going to play into building out an accessibility process or a procurement

plan? And looking at the policy that you have written, is it just accessibility policy?

If you have procurement policy, can you start writing accessibility into it a little bit? If you have access to some of the proper stakeholder groups, such as legal counsel and procurement and IT, is this through something that could be an accessibility committee? Trying to get some of those stakeholders working as liaisons to kind of push out that education and awareness to get the same definition of accessibility pushed throughout the university.

Do you consider yourself an accessibility specialist? I like to ask this question because more times than not, we often hear individuals say, you know what? I actually asked a question about accessibility in one of our meetings. And now, all of a sudden, I've been thrown the hat of accessibility and I'm having to figure these things out. Where do I start? What do I do?

And then, I try to do a follow-up of that of asking, does that person have a business mindset? Do you really think large picture business, how the business case might be needed based upon procurement versus distance education versus the library? These are good things to think about when you're trying to start building in procurement. Because each different department that you're going to be working with has a different business case that they have to work with.

So how can you fit accessibility, specifically, into their world? Am being able to find those different things might help make it a little bit easier to build the accessibility into that procurement process.

So looking at this and trying to define that process, looking to see, do you have consistent contract language? Do you have a consistent workflow to create contract language based upon the different documents or process that you may have? So for example, do you always ask for a VPAT? And if so, do you connect that VPAT, or the level of accessibility from that, to the contract language?

Do you provide testing and reporting of that software, and do you combine that in with the contract language? Do you ask for timelines and road maps from the vendor? Do you tie that into the contract language?

These are all different things to think about when you're starting to define an actual process of, what are you going to be doing in-house versus what are you going to be requesting and asking of the vendor? And how is that going to really lay that process out based upon the

contract language that you might be using?

So when you're doing testing, a lot of folks will say, well, we don't have the resources available to be able to provide the testing that we would like. Well, there are automated and there are manual types of testing. So if you can ask for a demo of that product, and you don't have someone to provide manual testing, there are a lot of free automated tools that can be used.

One of the favorites is WebAIM WAVE. It's a very simple green, yellow, red. We all know that, as a stoplight, if it's red, we stop. Well, it's the same aspect here. If it's WAVE and the error shows up as a red, it means that it's a substantial error that needs to be fixed for someone using assistive technology to be able to access whatever that issue might be.

Another one is Siteimprove has done a free plug-in on their Chrome. And that's another one that you can actually base upon, are you a developer? Are you a content manager?

Are you looking at just level A to begin with? Are you looking at level AA within the WCAG standards. It allows you to kind of start a little smaller, rather than a larger picture, of what WCAG does. So there's a lot of automated, free tools that can be used to help you start to go through and create a testing plan to test these product demos.

A lot of times, I'll find that if we don't have time to get a product demo, or we're having problems with that, then check out the vendor website and just run a quick automated scan on that vendor website. Because the websites are far easier to design in HTML than what an application would be. So it will allow you to see, is the company starting to put accessibility into the process and into the priority level of that company, to see if their website's accessible.

If their website's not accessible, then chances are their product's not going to be accessible. So these are just some of the different things to think about when you are looking at different vendors.

Finally, looking at and providing some documentation around what you're going to be receiving. So what happens if it's not going to be accessible? Could you create an alternative action plan to provide an accommodation based upon the specific issues of that product? Maybe it's going to be something that's a standard product that's really used within the industry.

Let's use Adobe as an example. And if we are looking at Adobe InDesign, what happens if there's no other product that can do what InDesign can do and it's maybe a sole source? What

happens if Adobe Professional, DC, has a competitor? And what happens if that competitor might be more accessible, but no one uses it because Adobe DC is really the industry standard?

So try to look at these things and try to create some alternative action plans that might help provide accommodation specific to those types of applications. But also looking at it from that business case of, if it's industry standard, are we better off trying to provide and teach individuals how to use the software and provide that alternative action plan as an interim, still working with the vendor, in hopes of their making a more accessible product? Versus moving them to a more accessible product that might not be an industry standard, forcing them to still learn an industry standard application later on. So these are all things to have to think about when you're starting to design a process.

Looking at some of the different recommendations for procurement processes and policies. So look at the organization's commitment to the accessibility. And these things can be both internal to your university, as well as external when you're looking at different vendors.

So from a university, or college, standpoint, looking at the college's commitment statement. And this can be the university's [AUDIO OUT] statement. It has nothing to do with accessibility, specifically, but most of the time, you'll see something around inclusion or diversity or something like that. Well, let's broaden that out and see how we can include accessibility into that.

If it's going to be a vendor standpoint, looking at their commitment statement, Some vendors are starting to include accessibility into that. Looking to see how we can then pull those things and apply them to the procurement. Because we are then calling out the vendors based upon their commitment statements to say, hey, you actually are saying that you are building towards WCAG 2.0 level AA, but you're denying our accessibility language in the contract. What's going on here?

So you can use some of these things as you look through the policies and the processes. When you are starting to work with the vendors, create some basic provisions, something that's easy. Asking vendors for VPATs, which is a Voluntary Product Accessibility Template. Asking the vendor to highlight some of the different accessibility features that are within their product themselves.

Now, there's always a large controversy on, are asking for VPATs worth it? Well, yes and no. The pro to that is asking for a VPAT and seeing the response to the vendor. If the vendor says, we don't have one or what is that? Or if you could send us a template, we can fill it out.

Those are all flags. Those are just red flags thinking, or knowing, that a vendor really isn't pushing accessibility into their process, or they really haven't made it a priority yet. Because they don't have a VPAT readily available, or the VPAT is not on their website, then it's really not part of their process yet. Whereas the flip side of that is, if you go to their vendor website and search for VPAT or search for accessibility, and you start to see that commitment statement, or you actually can find a VPAT, then this can give you an idea of an insight on where the vendor is starting to add accessibility into their priority levels.

I like to ask the vendors if there's any accessibility features. Because if there is, when you are starting to test an application, you know to go directly into the My Account to open up and turn on the accessible feature. Or sometimes, when you first sign into something, there might be an accessibility mode or something along those lines. Knowing those things are very helpful, especially when you start creating a testing plan.

Finally, know where to go when you need advice in regard to the accessible procurement. So most the time, we either have the sales guys or the developers. And when it comes to the sales guys, they don't necessarily talk accessibility, but they can talk about the contract, or at least get you to the group that's going to. Whereas the developers could talk about the actual accessibility and the development.

So making sure you have everyone on the call when you're talking about those things. Or if you're the accessibility expert and you need someone from procurement in the room, or legal counsel in the room, making sure you ask those individuals. So that way, you're getting everybody on the same page. So as it goes through a procurement process, it can easily go through and you get everyone's stamps of approval.

So I did see there were a couple of questions coming in at the top. Sofia, is there anything that should be answered right now?

SOFIA LEIVA: We can compile them for the end, and then you can answer them then, if that works for you.

KARA ZIRKLE: That works for me. Keep the questions coming in so that way-- write them in as you remember. So that way you don't forget anything once we start moving forward.

So looking at a procurement policy, one of the questions I was asked earlier on is, do you have policy, and what types? So was it accessibility, was it procurement? The one that we didn't ask is, was it an actual accessible procurement policy?

Most of the time, you'll see universities use an accessible technology or an accessibility policy, and they might tie in something around procurement. Whereas other schools have a procurement policy and try to tie in a little bit about accessibility into that procurement policy, or they might have both.

So one of the things I have here is a snippet from George Mason University. And they have something called an Architecture Standards Review Board. It's an Architecture Standards Committee. And one of the things that we had done there were, when items come in, they were actually checked for duplication. Did another department already purchase 500 licenses of something? If so, if we add this other 200 licenses that Department A is looking at to the one that already has 500 licenses, Department B, can we cut the cost down?

The other one was, is it going to work with the technology that we have in-house? We're going to look at security. We're going to look at accessibility. These are some of the different things that this review committee would look at.

As part of that, if someone did not go through the process to get things checked, then they did have the potential of those applications getting pulled by the next time they came around for a renewal. So those were some of the things that were specific to procurement within George Mason University.

Now the flip-side, looking at Miami, one of the things that we've done with our policy is we've put a procurement section into it. So that way, it's an overall larger accessibility policy that just calls out that procurement piece. So those are just a couple different examples to show how policy can be written. I like to provide as many examples as I can because each and every school is very different.

So the links here are going to show you some of the different example policies in Higher Education. It's going to link to the two that I have the snippets of. But then you're also going to look at some of the contract, addendum, and RFP procurement language from some of the different schools, as well.

So thinking about that, I'm actually going to go back a slide. Maybe not. One second.

So looking at this, contracts, addendums, and RFPs are very different. So when I showed that very first slide of talking about all the different ways that you can procure something, contract language is often very different from RFP language. If you have an addendum, an addendum is often the renewals. So the contract might be every five years, but you might have a purchase request come in once a year during that five years to where you might be able to add an addendum to that. Or sometimes, there's only license agreements.

Knowing the different features and the different documents that you are using within your procurement process is very important to ensure that you have accessibility language in all of those different things. So that way, regardless of whether it's a five-year contract or a one-year contract, you can try to get accessibility working into it throughout the year-after-year process.

So looking at compliance overall, it's not just the standards that are set within the policy itself that really looks at that level of compliance. So when I say that, it's more of-- within a policy, you might have all of these various WCAG 2.0 section 508. It might have the Braille standards. It might have ATAG, which is more of your Authoring Tool Guidelines, things like that.

Not every single standard is going to apply to every single technology. So knowing which standards apply to the different types of technologies that you will be working with is very important to ensure that you are asking the proper questions to the vendors. So for anyone not familiar, ATAG is an authoring tool set of accessibility guidelines. And that's going to be for any application that will have an authoring.

So think of your content management systems. Think of your learning management systems. Things that have a WYSIWYG type of feature into it. These are going to likely be authoring tools.

And the accessibility guidelines are basically asking the vendor, can someone with a disability, or can someone using assistive technology also use this application? Is it accessible for the end user, the developer creating the content, or is there only accessibility features to where the end user can actually access the information?

Looking at exceptions, there's usually exceptions to the rule. So what are your exceptions? Looking at that. It's very important that when you are writing policy that there are going to be some consequences. Or something along the repercussions of, if someone's not following what has been written, then what?

And that's where I go back to, if someone didn't follow suit and apply or go through that Architecture Standards Committee, then they had the option of that project actually getting pulled the next procurement cycle. Now, did it ever happen? I don't think so. But at the same time, it was a consequence to not following policy.

Within that, what happens if there needs to be remediation? That should always be a section of that policy area. Sometimes it's very helpful if you could have support letters coming from that president or that provost, someone stating, hey, we have this new policy put in place, or here's the new procurement plan. We would appreciate everyone to be able to follow it.

And it's supported out by the president or is supported by the provost, whoever might be able to send that out. And that's also asking about that buy-in support. Because if you can get something like that coming from a higher-up, then more people are going to be listening and paying attention to it.

So looking at a procurement start-up plan. So we've talked a lot from a very large perspective. So if you don't already, look at putting together an accessibility committee. This is really going to help to ensure that you have someone from your procurement process. It's also very helpful to have someone from your legal counsel.

This is going to be more than just procurement. It can be larger, to really work and start to weave into your online courses, into your libraries. It can bleed into a lot of different sections within accessibility.

But when you're doing this, and you can actually work with your procuring department, look to see, is there software that they use as part of their purchasing? Can you get in as part of the review process, or can you do an approval within that software application?

So that way, when someone submits something through procurement, it's getting approved that there's funds for it to be purchased. It's going through the next approval, that could be security. It's going through the next approval, make it accessibility. The next approval could be your procurement committee or your purchasing group that says, yes, go ahead and purchase it.

Put yourself into that process if you can. It's also helpful if you can have a purchasing review committee if you make it larger, very similar to what George Mason had done. So these are just some of the different ideas or suggestions that you could do when you're really trying to

start a procurement process.

When you're looking at accessibility issues, really include that accessibility from the start. We often tell vendors to include accessibility from the start when they are designing. Or we tell our faculty to start using accessibility at the very beginning, when they design their documents or their websites or their course material.

But we also need to do that in regard to looking at the entire life cycle of what procurement is, and that procurement is as early on as we have an RFP that might have these three different vendors. Are we asking about accessibility in that RFP? Are we including part of the scoring of that RFP on how accessible they are? We can also include accessibility from the start of this procurement process.

If it's going to be a contract versus a renewal versus an addendum, how you're going to include these different pieces, even if it's going to be-- the time you start your procurement process is going to be May 1. So all of the contracts that have been put into place prior to May 1 may come up for a renewal, or maybe a license agreement or an addendum comes up.

And that might be a point in time that you can say, hey, vendor, you've been put on notice. These are the accessibility standards that we are now complying to. We're asking our vendors to comply to these. And as part of this, you may not have been asked before, but we're now asking for a voluntary product accessibility template.

Or we might start asking for a demo so we can begin testing your application, and we're going to provide you a report. And by the time the contract comes up for renewal again, we're going to request that you have made the changes that we found to make your product more accessible. So even if you have something put in place in the future, it doesn't mean that you can't use these addendums or these renewal periods to your advantage to at least put the vendor on notice that you're looking for some accessibility things.

So also, if you can, involve users with disabilities to test the applications. They use the AT software every day. They can find things better than those who are using it just to test. Looking at it is also making sure that everyone within the purchasing process knows the different questions that you're going to be asking vendors, how you're going to be educating those vendors, and what the process is around your test plan or your accessibility review, or what the requirements are that you're going to be asking for.

Making sure everyone either has a P-card for a credit card purchase versus someone within a procurement office, whoever it might be. Making sure everyone knows the process that's in place and can answer the accessibility questions, if asked, or at least knows who to point the vendor to when those people are asking questions.

Look at it from a perspective of-- you may want to provide or create that one individual or group to approve those purchase approvals. And that's where, if you have a software in place, sometimes there's an Ellucian software that people use because Banner's a large product. Other times, there's something within PeopleSoft. There is a Buyway system.

There's a lot of different procurement softwares that your procurement office might be using. See if you can have one of those purchase approvals put in, whether it's going to be a specific individual for accessibility or it's going to be a group. It might be whoever's available can check that. And then start with your accessibility process or whatever that might look like. But see if you can create that approval within that.

And then finally, going back to have a good, strong exception qualification, whether it's going to be a fundamental alteration, security, if it's going to be an industry standard. Whatever it might look like, have that documented and have a process put in place on how that can be requested, and what the approval or deny would look like if someone would need to go with that.

Finally, if you're doing this and an application is not going to meet full compliance, but yet you still need to use it, what would an alternative action plan look like, and how would you put that in place? So that way, those individuals from your school purchasing it know what to do for when a student with a disability comes in and says, hey, I'm in your class now. And I'm going to still be taking this biology lab.

And the person teaching it, or the biology department says, no problem. We have this action plan. We know that you may experience this issue with this software and here's what we're going to do as a work-around for it.

And that can sometimes be a discussion around the group purchasing, disability services, your accessibility group, whatever that might look like. And though you need to come up with a very generic, high-level plan that might still need to be specialized specific to that individual, it still gives you a very good idea of what you can do as an alternative if someone does come that needs to use a software that's not fully accessible, and there's no other better option at this

point.

So looking at the automatic exceptions. These are things that you can find on the Miami website. And these are just some of the things that we have used.

But it's going to be any technology or software that fall within specific categories that require part of the exceptions. We do look at it from a standpoint that someone needs to submit a request for an exception. And our director would be the one looking at this exception and would provide an approval or denial based upon that information.

Now, even if there is an exception that's approved, doesn't mean that we still would not be providing an equally effective alternative action plan. And that action plan is what individuals can use, if they need to, when they're starting to use the software.

Finally, looking at some of the best practices. Now this is also a larger perspective. This is actually pulled out from parts of what EDUCAUSE has provided for some of the different consensus agreements. But all of them usually say, accessibility policy needs to include some type of Electronic and Information Technology, establishing what a grievance or remediation process would look like around that that can tie into the policy.

We've talked a lot about the procurement and the procedures there. But also the training, making sure everyone's on the same page, speaking the same language. So when we talk about accessibility, everyone knows what that means, what the processes are. Sometimes that can be done by creating a single website or a portal around accessibility.

If you don't already, then look at possibly hiring some accessibility staff. So it was nice to see that there was a lot of accessibility specialists on the call. So it looks like there's probably less than half of you that might not have that accessibility staff. Or if you do, there's someone that is still learning.

Finally, looking at issues. How do you track some of these issues that you find when you're doing testing or when you're doing procurement? How are you tracking the things that you're looking at?

If you're doing an audit and testing it, how are you reporting that out to the vendor? These are also things to think of. You can't catch everything, and that's OK.

When you are trying to create some of these things, you have to find a good way to prioritize.

So you can do that by looking at a monetary value. You can look at it by including that contract language in some of those addendums or renewals and trying to give yourself a backstop.

You can also look at it from a certain risk level. Creating yourself a risk matrix is a very helpful piece of information when you're getting something in from procurement. You may have five different things coming in at once, and how do you prioritize it?

Well, by asking some of the questions of, how many users are there? Are they students? Are they faculty and staff? Is it going out to the public? Is it everyone or is it just certain departments? Things like this can help you establish that risk.

What's your testing process, as well as your reporting? Looking at the vendors, what are you expecting to come back from them? We ask for timelines and road maps. So that way, we can see how long a vendor may take to make the changes found in a test report, and when that's going to fall within their road maps. Finally, some groups actually do risk statements around, if we purchase this as-is right now, it may provide x-y-z type of risk.

So where do you start? What can you do? Again, going back to trying to use some type of automated testing for your applications. Do you have students?

Could you ask the students to do testing? Student work is always our cheaper side of work. So maybe teaching them about accessibility.

What process do you have in place for testing? Looking at the vendor website, as well as the actual application you purchase. And usually, a minimum, ask for that VPAT. So that way, you can get an idea of where the vendor puts accessibility into an importance of their process.

So I've talked a lot about VPATs. And I often get the question of, how do I read one? Or how do I know if a vendor's fully completed a VPAT the way it needs to be? And now, granted, this is the old section 508 standards. But this was actually something that was taken from the UDL campus, and their link is at the very bottom. They have an accessible version on their website.

But with this, it actually will show the criteria. And that criteria is basically saying, hey, for every image, it needs to have a description. And does it support? Does it support with exceptions?

It does not support. It might support in a future version. There's a lot of different answers around that supporting features.

But then, finally, you have to have the remarks and explanations. If a vendor does not put a decent level of explanation in this section to provide me enough to understand why it only supports with an exception, versus does not support, I will send it back to the vendor and ask them to complete it and provide them more of a sample of a better completed VPAT path from-- whether it be another vendor or just a sample or whatever it might be. And I go back to the vendor and actually ask them to complete a better VPAT.

Doing it once and explaining that will be helpful. Because sometimes, they don't know that a VPAT-- ones for one school can be shared with another school. They sometimes don't understand that a single VPAT can be shared regardless. But if they better that VPAT, they can then use that same document to other schools. It'll also help them, as well. So by asking that question, it sometimes cuts down the work of other schools also looking for accessibility.

Looking at the matrix. So another question we often get is, looking at the old standards, which is really where most of the vendors are still looking at-- if they're aware of accessibility, only a small fraction of them are familiar with WCAG 2.0, and even a smaller fraction than that are aware of the Section 508 Refresh, which is really a lot of WCAG 2.0. Most of your vendors are still back into the old Section 508 days.

And I will often get something for just software that's, OK, here's my 1194.21 VPAT. There you go. And I often have to say, that's not enough. That doesn't give me the full picture of what we're looking at for the software. Because the functionality of a software application in 2001 is very different than what we have now in 2018. So we try to use this as a matrix, so that way, vendors don't have to recreate or complete an entirely new WCAG 2.0 or Section 508 Refresh VPAT.

If they have the old ones, that's fine. We can accept those. But we're actually asking for a little bit more information around that, or which ones might actually apply based upon what type of hardware or software or website that they may have. It's always good though, to have a WCAG 2.0 VPAT, as well. So if a vendor doesn't have a VPAT, and they're starting from scratch, then they're filling out the most updated version.

So going through and looking at this, making the purchase. Looking at all of the different ways that you can have a purchase come in. And I try to put these in because there's so many different ways. I often forget all of the different ones when I talk about it.

But purchase orders. Purchase orders are difficult because sometimes there is no direct--

there's no procurement official approving it as a final order. Because it's a purchase order, it could be a direct pay from whatever department is purchasing that.

It's also very similar when you have a credit card purchase. There is no way of necessarily knowing when that item will be purchased. So if you have that, and you know that you have that, then learning or thinking of different ways that you can implement accessibility into that would be helpful. But it might be very different than how you would need to implement accessibility into a license agreement versus a contract, or an addendum versus even those with RFPs.

RFPs is really your chance of asking all the hard questions for vendors to answer, and asking for that VPAT. Asking if they have users with disabilities testing their applications. Do they put accessibility into part of their test plan? You can ask a lot of those hard questions to the vendors. But those are all different types of areas that you can look at different ways of making a purchase.

And how can you track each and every one of these? Because sometimes, they can be tracked differently based upon if you have a procurement software or if you're still in a paper form. Credit card purchases, those are difficult in and of itself. So when you're looking at the purchase procurement process, also think about what you can do to create or use e-database or a project management tool. So that way you can help track.

Some of the different contract language. This one is just pulling out to say the vendor would acknowledge that they're submitting a VPAT. And that they are trying to comply to WCAG 2.0. And within that, they're going to be agreeing to correct the issues within the time frame. That could be that timeline and road map they talked about. You can actually-- if you test something, you can add that report as part of the contract as an exhibit item.

You may want to look at or think of how you can reserve the right to perform additional testing during the agreement. Or if a vendor doesn't agree to make the changes, then you can't be held accountable for that. There's a lot of different things to think about when you're trying to create or produce contract language around accessibility. So these are just some of the different things to think about.

So documenting and managing. This has been one of the larger areas that really can help pull together the process that you can create. So regardless of whether you have a testing plan or a procurement process, or even just an accessibility policy, first and foremost, look at how you

can start documenting and managing all of the requests that could come in.

So there's a form that can be completed. And with that, the requester would then be able to track the process around the testing, around the client engagement with the vendor, with finally producing, back to that original requester, the information they need to then be able to move forward.

So for us, one of the things that it looks at was we actually started to use what IT uses for their tracking, for their IT tickets. It was something already in play. So that's a great thing to look at to see if your school already has something like that that could also be of benefit. One of the things that we try to ask is the business case, trying to understand what the software or hardware is going to be used for.

Who's the audience? Is it going to be faculty only? Is it going to be faculty, staff, and students? Is it going to be students only? The size of the audience. So if it's going to be a small staff of five people versus 10,000 students, then you can kind of start to see where that risk analysis might come into play and how that might change some things.

Also, it's helpful to ask the deadline for that purchase. Because often, as people start to learn and understand about your accessibility process, you may get things very last minute to say, well, this needs to still be purchased tomorrow. And now there's this new accessibility review.

What do you mean? I'm just learning of it. So trying to ask that information up front. And also trying to really push out the education awareness of the process that's being put in place once it's there. It's very important to help cut those things down.

How you prioritize is really looking at it from the perspective of the number of users, the audience, the departments, who's going to be using it, the business case, things like that. You can create your own prioritization matrix.

Looking at the current workflow that we are using, all of our purchases originate through a software called Buyway. And a requester puts this in. It goes through the routed workflow. And it finally comes into our group for an accessibility review.

Once it comes in for any accessibility review, we begin our testing. So it's put in through our Team Dynamics System. And we do ask, is it for the classroom, the business function, the student, the organization?

And we start to pull in a lot of this information to where we also ask for the VPATs and we get a demo. Once we get a demo, we can begin our testing of these applications. And that's when we can have our project list.

So when we're looking at this, you can see what projects are in queue versus when something moves to client engagement, when it's going to be in testing versus moving over to quality assurance. We always have a second tester to check that report to make sure nothing's being missed. And then it moves back over to the final client engagement, where we are working with the vendor to ask for those road maps, those timelines, making sure those are going to be part of the contract within the purchasing group, and things like that.

So we also try to keep track of our time spent. I like to do this because if we base it upon our client and vendor engagement versus how much testing we need versus, sometimes, we're having to wait a long time wanting vendors to respond. This is all important information to track. Because over time, you might start to see where there are gaps in the way, or where the problem might actually be is more of the wait time on the vendor or the client, and where you can include more education.

And one of the other things is we actually can show how many hours we've spent just in testing an application. Many vendors have said, OK, here's our application. Here's the demo. We've tested it. We went back to them. They've provided us a timeline and road map.

The item got purchased. And by the next year, when the contract renewal comes up, they can say, hey, you know, we've actually made these additional changes, as well. Can we get a retest now? And because it's a client of ours, we'll do the retest.

But then after a while, you start to see how many hours spent. One of our departments actually went back to the vendor and said, hey, you're getting all of this free accessibility testing from us. How about giving us a discount? And they did it. It never hurts to ask. So tracking your time, you can use it and benefit from various different things.

So going through all of this and some of the takeaways. You should never do it alone. It really does take a lot of individuals. One of the other groups to look at is the Big 12. There's actually a procurement plan. It's almost like a book that they've started to write. They were just recently at CSUN where they were presenting on that and it gives a lot of information.

But all of the schools within that area are now starting to talk to where each one of them are

looking at having the same type of contract language. So that way, a vendor can't say, hey, we just sold to such-and-such school and they never asked for any of these. Why are you? So work with some of the other schools that are within your area, whether it's your state or whether it's your section-- whatever it might be.

You're not going to catch everything and that's OK. But it is important to start somewhere. So don't, I guess, get stuck in the weeds of thinking, oh, well, this isn't a good time to start. We need to start here because this is more of our heavy-- June to July is usually the fiscal time, so let's start in July. You don't have to do that. Really, just getting started and just jumping in is more important than trying to find the right time.

Just remember, you have to be flexible. It's not going to be black and white. You have to be very lax in a way of it's a very fluid environment. It's constantly moving.

So keep that in mind so you don't get too frustrated when you're starting to build some of these things into place. Because frustration will really start to cause complications. Because once you're frustrated, you're just like, well now what? So really just keep that in mind so that way, you don't get stuck somewhere along the way.

And finally, technology is only as good as you can use it. And I say that in regard to the technology that the university or college may have might work for you-- like the IT ticketing software or the procurement software-- but other times it doesn't. So even using something as simple as a SharePoint site or an Excel spreadsheet or something like that might work best for you. So use what works for you. And that's really the most important to kind of get started in your tracking.

Some of the different resources-- if you want to learn where you are in regard to accessibility plan, whether it's procurement or accessibility in general, here are some of the different benchmarking tools or maturity models. One of my favorites is the very bottom one, the Policy Driven Adoption for Accessibility because it's really all around that procurement and that policy piece.

If you want to just take a good 15 minutes to say, hey, where do we fall? The Tech Check, which is the first bullet, is a really good, quick resource that gives you an idea. It asks a series of maybe 10 to 15 questions to kind of go through and get an idea of where you really are. And they all provide next steps. And what you can do next to help better strengthen your process.

So finally, my contact information is here. Feel free to contact me. I'm also usually on LinkedIn. So with that, please shoot questions.

SOFIA LEIVA: Thanks so much, Kara. So the first question that we have that came in is, "What does fundamental alternation refer to in the exceptions?"

KARA ZIRKLE: Oh, good question. So fundamental alteration. It's requiring you to change a product so much to make it accessible that it's changing the actual functionality of what it was designed for. That's a fundamental alteration.

An old example, but I like it because it's one that works, is the pagers. People used to carry pagers around so that way, it would just buzz on their hip and let someone be able to see the phone number and the message that someone put in. Well, if you would actually start to make sound go along with that, or a blinking light or something, then that was actually fundamentally altering the point of, it's something that's very small and not very noticeable in getting someone's attention. So it's an old example, but I like it because it's one that's very easy to use.

SOFIA LEIVA: Thank you. The next question we have is a two-part. "Who determines which products need accessibility requirements, buyer or a more specialized accessibility expert or team? Also, same question for who do you see as the evaluator of vendor VPATs, demos, et cetera to determine if acceptable to meet requirements and are OK to purchase"

KARA ZIRKLE: So if there is an accessibility specialist there, they would be the ones reviewing the VPAT, and also testing the demo to the WCAG 2.0 level AA standards. Or if you're not within the US, whatever standards might apply to that country.

As to which standards apply, those are usually-- looking at it from a policy perspective-- most schools are going with WCAG 2.0, just because Section 508 Refresh did just take effect in January. So if it's anything within the States, it's usually the standard that we look at. If it's outside of that, then-- in Canada, you have AOTA, which is very similar to WCAG 2.0. But each country does have their own.

If it's going to be looking at it from a standpoint of that authoring tool, then there are those standards, as well. Really, looking at the definition of each standard, it's very obvious as to which ones would fall into which sections, whether it's a web-based application, whether it's a

video versus documentation that might need Braille, or whatever it might be. But most of those definitions usually allow you to see which one's will apply.

SOFIA LEIVA: Thank you. The next question we have is, "What is an automated testing application? Could you give an example?"

KARA ZIRKLE: Sure. An automated testing application is usually a software or a web plug-in that will spider through a website or an application. So a lot of times, if you look at and Google WebAIM-- W-E-B-A-I-M-- WAVE-- W-A-V-E-- that's a good example of an automated tool. They actually have it put in as a URL, so you can actually plug in or drop in, say, overstock.com, and it'll go to that site and have that spider through and show it.

But they also have it as plug-ins to your browser. So that way, if you're on any website, all you have to do is click on the plug-in and it'll spider through that site to actually give you the errors that come up. And those are the free tools. There's also at-cost tools that'll do a little bit more, that's not just a page-by-page basis. But they provide reporting information about accessibility even when you don't have the specialist to do the manual testing.

SOFIA LEIVA: Thank you. We have time for one more question. "Do you have a recommendation on how to implement VPAT in a de-centralized, multi-college/campus district?"

KARA ZIRKLE: Really, it goes back to the education and awareness. If it's really that large, I would look at how they are pushing out the security education and awareness or another type of required training. I know Title IX has also been one that's really become a little bit more known within the last couple of years.

So look to see how those areas have been successful, and see if you can piggyback on the types or the ways that they're doing their education to also do your own education in regard to the procurement and the VPAT and the accessibility.

SOFIA LEIVA: Great. Thank you so much. Thanks, everyone, for joining. And thank you, Kara, for a great presentation.