

LILY BOND: Well, welcome everyone, and thank you for joining this webinar entitled, "What One School Learned from DOJ and OCR Accessibility Rulings at Other Institutions." I'm Lily Bond from 3Play Media, and I'll be moderating today. And I'm thrilled to be joined by Terrill Thompson and Sheryl Burgstahler from the University of Washington. Terrill is the technology accessibility specialist there, and Sheryl is the Director of Accessible Technology Services, and they have some great lessons learned for you today. We have about 45 minutes for the presentation, followed by 15 minutes for Q&A. And with that, I'm going to hand it off to Sheryl and Terrill, who have a wonderful presentation prepared for you.

SHERYL BURGSTAHLER: Hello. Let's get started it here. I wanted to just start with a question for you. So the question is, what do these schools have in common? And you can type in the question area. Just type in your response. We've got a lot of schools listed here. Notice that we're not on it, the University of Washington. But we've got the University of Cincinnati, Youngstown State University, MIT, Harvard, Florida State University. We have some networks of community colleges-- California Community Colleges and the Maricopa Community College District.

We're getting a lot of responses here. They've been sued. There's a 508 complaint. So we're getting some responses. They've received some OCR complaints-- OCR and DOJ complaints. They've been sued. All have been served with a civil rights complaint. Well, we have a lot of people now giving information that kind of suggests civil rights complaints and litigation. And, wow, you passed the first exam. I used to teach middle school, so I have to have a lot of pop quizzes here.

Yes, this is just a short list. But all of these institutions have received civil rights complaints, either through a complaint through the Department of Justice or the Office of Civil Rights-- those are federal agencies. Or actually in a court of law, a lawsuit.

So what is the legal basis? When you look at these lawsuits and civil rights complaints, what laws are they saying that these schools violate? Well, there's Section 504 of the Rehabilitation Act that's mentioned in all of them. And that was enacted in 1973. We all know about the Americans with Disabilities Act of 1990 and its 2008 amendments. So that's mentioned in all of these. And there are state and local laws in some cases. In our state, it's Washington policy number 188, which requires IT accessibility.

Some people point out that neither of these federal laws mention IT specifically. Well, you need to keep in mind that they're civil rights laws. And so they're basically saying that whatever you offer at your institution, people with disabilities have a civil right to that offering. So if a student is accepted at your institution to be in an online course, or to participate in some way-- if it's a student with a disability, they have a right to participate. If someone from the outside is accessing your websites that you make available to the public, and you haven't captioned a video, and they happened to be deaf, well, you've violated these civil rights laws, because you haven't provided a service that you're providing to other people, but to be inclusive of people who are deaf in that case.

So let's take a look at what the definition of "accessible" is in these particular instances. This is the definition used by the Office of Civil Rights of the Department of Justice in these particular matters. "'Accessible' means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services"-- that's very, very broad-- "as a person without a disability in an equally effective, equally integrated manner, with substantially equivalent ease of use. The person with a disability must be able to obtain the information as fully, equally, and independently as a person without a disability."

I think this definition is very specific, very pragmatic, and it makes it really clear that what we're shooting for is that people with disabilities using our IT will have the same experiences as students without disabilities, and other individuals like faculty and staff and visitors to our websites. On our campuses there are two approaches to access.

One is accommodations. That's the one most typically used where we have extra time on tests. We have captioned videos. We make materials in alternative formats. These are accommodations. They are designed for an individual person. And they are designed reactively. So it's when something, let's say in a class, is not fully accessible to a student with a disability, then your disability services office makes accommodations to make that course more accessible.

The other approach is universal or inclusive design. And universal or inclusive design is a practice of making things proactively accessible. Both are really important, by the way. So what is universal design? Well, universal design, as defined by the Center for Universal Design, is, "the design of products and environments to be usable by all people to the greatest extent possible without the need for adaptation or specialized design."

So when we apply universal design, we look at the environment, we look at the IT product, and we ask ourselves, how could we make this product more accessible and usable to someone? In our case, we're talking about disability today, so someone who's blind or deaf or has a learning disability. How can we do that proactively so when they engage in a course or go to our website it's accessible to them?

Universal design is on a continuum. And so it isn't like just done. Maybe we'll never encounter a universally designed product that is fully accessible to everybody you could imagine. But when you look at the continuum, if we look at the physical environment, this first picture shows a young man who's reaching over from his wheelchair to open a door. It looks a little awkward, but to me it looks like he's probably able to open that door. So that's sort of, technically accessible to him.

In the next picture, it shows one of these typical buttons, pushed to open with a little wheelchair symbol. And that makes it more accessible. He could have used that, someone else who could push the button. But there are people who wouldn't be able to push that button-- for instance, people who are quadriplegic.

The last image is what we've grown to accept at grocery stores, where we just simply walk up to the door and there's a sensor that opens the door for us. And so this type of entrance is accessible to an adult, to children, to dogs, to whatever could move through there. And so that would be more fully universally designed.

We can apply this to technology by taking a look at a video. If a typical video is used in a course and it's uncaptioned, it's accessible probably to most people in the course, but not to some of them, like a person who's deaf. If we provide an interpreter for a person who's deaf in that class, that interpreter could interpret that video. Kind of awkward though, because you can kind of imagine, if you have to look at the video for the visual content, but then you look at a person to do the translation, that's not very usable. It's technically accessible, I would guess.

So we could go a step further and caption the video. That way the student who's deaf can look at the captions on the same screen as the video and see the text. But they also can go back and review that video like anyone else if the faculty member makes it available online. It also benefits people who have learning disabilities when they want to see the video-- the visual and the auditory output at the same time. People who are English language learners-- so they need those two modes as well. And people that just simply want to know that the spelling of

the words that are being used in the video.

We could go one step further, and we could make that video captioned, but also audio described. Audio description is adding a little bit of audio content that will describe key images in the video. So we could do that. So again, on a continuum.

Now I said we'd talk about the UW efforts. So we'll slip into that topic here. We were informed by our efforts by three things. First of all, these Department of Justice and OCR resolutions at other campuses. Terry will share our website, and we have a lot of them explained on our website. But also we link to the resolutions. In this case, notice I said resolutions. I didn't pay as much attention to the complaint as I did to the resolution. In other words, what did DOJ and OCR say these campuses were supposed to do in order to reach a resolution that assures them that their IT is more accessible?

A second thing, also based on those resolutions by the way, is the 2015 EDUCAUSE report on IT accessibility. It includes risk statements and evidence. It's available online. So you can search for that very easily. It's a good list to look through if you haven't already. And again, they base that list on those DOJ and OCR resolutions as well. And now we have a policy in the state of Washington on IT accessibility called policy number 188. And so we're meeting the requirements of that policy that we now have.

What are some of the lessons learned that we learned from these resolutions in particular?

Well, we learned a lot of things. One, we learned that it's important to conduct an audit to basically take a look, particularly at your high priority, high impact IT products like your learning management system. Look at the accessibility and develop a corrective action strategy to address problems identified in the audit. For instance, Terrill coordinates a nationwide group of over 100 people that are giving input to its structure on how to make the Canvas learning management system more accessible to students and faculty with disabilities. So we did that.

Another thing that we learned is that it's important to set institutional standards relating to accessible technology, and to create a method for monitoring compliance. A third thing that we learned is that provide training and education about accessibility to anyone on campus who is responsible for creating our procuring IT as well as those responsible for creating content is important. And so we provide some training. That's a tough one, by the way, because that takes a lot of staff time. But we've looked at online support as well, as you'll see from our

website and online training opportunities, such as what the 3Play Media is offering today.

The fourth thing we learned is the importance of instituting procedures for addressing accessibility as a requirement within the procurement process. And so we've really been focused on procurement. Do we have this problem solved yet? Absolutely not, but we have been making steady progress along the way.

And the fifth thing is to provide and publicize a mechanism by which students, faculty, staff, and members of the public can report access barriers. We have always had a case through our help system for people to report problems they're having with IT. But we're making a stronger statement, because of looking at all these resolutions, that they want it to be more prominent where people can complain if their accessibility complaints have not been resolved.

TERRILL

If I can interject-- excuse me, this is Terrill-- and just go back to that first slide. These five

THOMPSON:

issues that Sheryl has just covered, the lessons learned-- we came up with those, actually, in collaboration with our ADA coordinator, who is an attorney and works in the Risk Management Office which now they call themselves Compliance Services, I think.

But we sat down together and looked over that long list of OCR resolutions and settlements that Sheryl had on the second slide. And we saw some very consistent themes throughout all these resolutions. So certainly there's no shortage of settlements and resolutions to draw from. But one thing that we saw as we look through these was that OCR and DOJ are very consistent. They're being very clear. There's a lot of redundancy, a lot of consistency in the kind of things that they're asking people to do.

And so when we extracted these five points, it really sort of helps to make the process seem a little bit less daunting, I think. I like to look at it as five simple steps for making an institution accessible. And granted, these are fairly large steps and maybe not as simple once you start really getting into the weeds. But the fact that there are only five steps, I think, makes it a lot more palatable.

And I just want to have a little bit of commentary on each of these. Sheryl's already gone through them, but just from my perspective as technology accessibility specialist, one of the big things is that first step-- conducting an audit of the accessibility of IT. That, in order to figure out where you want to be, related to accessibility, you first need to know where you are.

And so looking at all your existing IT and asking, is this accessible, is an important starting

point. And so, are your websites accessible? Are your documents accessible? What sort of third-party software and applications and services are you using? And are those accessible?

And so Cheryl's talked about policy 188, the state policy here in Washington. And that actually is a new policy for us. And so it's got some fairly tight deadlines that are still in progress. We have one coming up in March where we need to have a roadmap for our accessibility that involves an inventory of our IT. So how do you conduct an inventory of your IT, particularly if you are like us, a large decentralized institution? There's IT all over the place.

What we're finding, and I've heard this from other schools too, is that that may seem daunting, but there are people who know, maybe not everything, but there are people on your campus who know a lot. And so we're finding that there have been security audits, that there are people who centrally manage software contracts that know a lot, people in procurement that know a lot. And so we are gradually piecing together all these pieces of information and figuring out where all the IT lies, who the service owners are for that IT, and then working collaboratively with those service owners to try to assess accessibility and prioritize and so forth.

Also, Sheryl's going to talk in a bit about who the various players are, but certainly this is a collaborative effort. We've got to reach out to people all over campus. And we're all in this together. It's the university that needs to be accessible, not just a particular department. And as a large decentralized institution, we're really dependent on people out there in the trenches who have IT that we don't know about, centrally.

Even though Sheryl and I are in accessible technology services, which is part of the central IT group, but we don't necessarily know what's going on out there in the departments and individual colleges. But we're building a network of liaisons who are the people who are out there in the trenches and know what sort of IT they're using. And so they're key partners in this as well.

So I guess the key takeaway on that item number one that I want to stress is collaboration-- reaching out and getting everybody on your campus involved, identifying stakeholders and finding partners, and working on that.

And then the second, in terms of the institutional standards-- those standards are pretty clear also from the OCR resolutions and the settlements that the Web Content Accessibility Guidelines 2.0 level AA, that is the standard. That's what's expected of us. And that has been

written into a number of policies and state laws and so forth as well. So we all are really looking at WCAG 2.0, level AA and developing a method to monitor compliance.

We've got websites. We've got documents. We've got videos-- all sorts of things that need to be evaluated and monitored. And so this is a big effort as well to have some sort of project in place with tools to help us track progress. And lots of tools are available out there. We actually use Siteimprove as a tool for measuring website accessibility. And we're tracking our improvements over time with that tool.

But then we also have hundreds of thousands of PDFs and other documents that we need to track. We've got videos galore that we need to track. And our focus has been most on developing tools to help us with that effort. For example, with videos, we developed a tool called the YouTube Caption Auditor, YTCA. And whenever we do stuff like this, we make it available for others to use as well. And that's up on GitHub if you just got to GitHub and look for a YouTube caption auditor then you'll find that.

But it basically uses Google's YouTube API. You enter a YouTube channel or a list of channels, and it will gather some data from the YouTube API about that channel, the videos that are on that channel. So you get some data back on a number of videos, number of hours of videos, traffic related to those videos so you can prioritize, and then how much of all that is captioned. So we're using that to sort of help us guide our captioning efforts, at least with videos that are on YouTube.

And then going back to number three here, providing training and education-- certainly we're trying to do that. Everybody who doesn't already know everything about accessibility needs some training. And so that really is everybody. So we're kind of looking at who the key stakeholders are. And one area of focus right now is the last piece here-- people who are responsible for creating content.

So we've been educating web developers for a long time. And we really have a strong network of people on campus who are developing things that now understand accessible development and ARIA and all those sorts of things. And there's always room for improvement there as well. We do trainings continually for them.

But an even harder group to reach are the hundreds of thousands of people, or tens of thousands, or thousands, however many there are, but lots and lots of people who are creating documents and don't know the first thing about the need to use headings properly or

the need to add descriptions to alt text, or alt text to images. Just some real basic stuff that needs to get out there that people need to get educated on. And so we're really putting a lot of focus on that now, educating people who are creating content and creating documents.

And then with respect to the procurement process, we've been working closely with our procurement group. And together, we actually came up with a three-step process for addressing accessibility in procurement. The first is to get accessibility into the RFPs. So anytime we're reaching out and we have requests for proposals out there, accessibility needs to be part of that. And so anybody who is bidding on a project needs to understand that we value accessibility. And they need to be able to have an accessible product and document how it's accessible, and explain to us how their product or service is going to be available for everyone, work for everyone, and how they can assure us that we're not placing ourselves at risk, and not discriminating against students or faculty or staff or visitors who aren't going to be able to use this.

So the first step is getting it in the RFP. The second is evaluating the responses that come back. So it's in the RFP-- Bidders send us a VPAT or they make some sort of statement about why they're accessible. We need to be able to judge that, and say, yes, this vendor really seems to know what they're talking about. We trust them, although we're going to ask some more follow-up questions. Or this vendor really doesn't answer this question well at all and doesn't seem to be serious about accessibility.

So the real question is, how do we develop the capacity to be able to answer those sorts of questions during the procurement process? And again, it really sort of comes down to education. We're educating people in procurement. We also are trying to build up enough capacity, internally within our group, to be at the table for those sorts of decisions. So if it's a major product that's going to affect a lot of people across campus, we want to be there in helping to evaluate those responses that come in from vendors and helping to evaluate products.

The third step then is to get accessibility built into the contracts, so that even if a product is not currently accessible-- we want to get the vendor to understand that they have to be accessible, and to agree to work towards specific benchmarks by specific dates, and to get all that in writing. So this is all part of our contractual procedures. We want to make sure that if you want to do business with us, we're willing to take a chance on you now, but you're going to

have to straighten out-- you're going to have to get your accessibility in line. Or when it comes time to re-evaluate then that's going to be a problem.

And this needs to happen for all of us. One institution can't take that strong a stand. Every institution has to take that strong a stand, and not do business with companies that are not accessible. And only then is the message going to be heard strongly enough that products start becoming accessible, because it's in a vendor's best interest from a marketing standpoint to have the most accessible product in a particular group.

And then, as Sheryl said, providing a mechanism for people to report barriers. And this helps us to prioritize then. If somebody has a particular issue-- we've got hundreds of different products that we're working with, and thousands or tens of thousands of websites that we're working with. We're not going to be able to make all of that accessible overnight. And so we have to acknowledge that.

But we have some strategies for prioritizing. And if there are current needs, current issues, then we want to hear about them, because that's going to help with our prioritization effort. And so trying to provide a means by which people can very easily make barriers known if they encounter them. So back over to you Sheryl to talk about lessons learned from all of that.

SHERYL

BURGSTAHLER:

Yeah. And following up on what Terry just is that it can be overwhelming to think-- if you're just getting started-- about all the technology you have on your campus. But as you prioritize, it's important to look at the products that are used most widely. But also, your number one priority should be the people with disabilities on your campus right this minute.

And your best partner there is working with Disabled Student Services, or you might have a separate disability services office for faculty and staff and visitors, as we do. It's good to meet with them and find out, what are the accessibility issues regarding IT right now? And my guess is what you'll find out is that your Disability Services Office for students spends most of their money, with respect to IT on captioning videos and making inaccessible PDFs accessible to students with disabilities in classes. So that gives you a good touch-point to see what efforts you want to put in, in those particular regards that help you prioritize things.

And so what has helped us too is that you don't have to think about everything-- every IT product that's used by a small work group on campus. It would be nice if all of those things were accessible. But if there isn't someone in the work team that needs an accessible product, maybe put that as a low priority.

So some of the things that we've applied on our own campus, then, is gaining high level buy-in. We actually have an approach where we work from the bottom up and the top down. I have to say over time we've probably been most successful working from the bottom up. But particularly with our certain new policy 188, we need to have more high level buy-in.

And so we prefer to use a carrot rather than a stick, but it's important that the high level administrators allow someone to be a spokesperson to say, these technologies need to be accessible. Because as Terry said, we need to involve a lot of stakeholders on campus.

We need to undertake efforts that are both reactive and proactive-- and so again, working with your disability services office. But I would like to point out too that it's not their problem. Their issue, their goal is to provide accommodations when there are things that are inaccessible to students, faculty, and staff on our campus.

Your job, if you're working for IT, is to make your IT accessible to everyone. And I think if you ask anyone in an IT organization, do you provide technology when you deploy it for the whole campus so that everybody can use it, including those mobile apps and so forth-- is that the goal? They'd all say, yes, of course. But then when you start talking about, what about a student who's blind or what about a student who's deaf? Sometimes they think, well, we just don't have the resources to do that.

Well, then, maybe you just are trying to do too many different things then if you can't really meet the needs of the whole population. But reactive and proactive are both important. Top down, bottom up are both important. It's important to have a policy. We have a short aspirational policy that's on the website that Terry's going to be talking about in a minute. It points to the legal basis, but it also points to guidelines.

And so it's not enough just to say, oh yeah, we want to make our IT accessible to everybody. What are the guidelines? And that's where we point to the WCAG 2.0 level, AA, that Terry mentioned. And we have links to that if you don't know what that is. But those guidelines are really important as well. But we put our details in the guidelines where we have a policy as being a really broad statement.

When we developed our policy, the goal was that it wouldn't go out of date. Now probably it will somewhere down the road. But it doesn't have so many specifics that we're going to have to go in change it all the time. The guidelines-- they're very agile. We can change those when we

want.

We are conducting IT accessibility inventory, even looking at a development tool to do that. We're engaging in advisory groups, task forces, special interest groups. In the case of accessibility IT, we have a task force. We've had one for over three years. It's focused on IT accessibility that involves stakeholders from around campus. And we set guidelines, we helped develop policy, and we spread the word, campus-wide.

But then we also have these liaisons, as Terry mentioned, where they're a group of people that know something about accessibility. We have almost 40 of them now, where they're spreading the word on campus, and we regularly train them and have meetings with them to talk about our policies and so forth.

We have a special interest group. We have several of them. But one example is the web accessibility group. They meet once a month. They have an online discussion list and communicate that way as well. Other things that we're doing is creating a concrete plan. It's an internal plan, although we're converting it now to a plan that we can share externally. So you'll see it up on our website soon. But we have a very detailed plan. What are we doing? And what can we do now? What's going to take longer? What's our timeline?

We create annual reports about how accessible the IT is on our campus. We build on existing policies, processes, and responsibilities. I look through all of the processes and policies within the IT domain that are given down to us from the CIO at the state level and found one particular policy that the university complies with that's about procurement and development of IT-- guidelines about security and so forth. We had accessibility inserted in that document in the last version, but now we're putting in more detail in this next version that's being created. So look at what we already have for policies and see if accessibility should be included.

As we've mentioned, we've developed web resources. We provide consulting, training, and we do promotional activities. The one most noteworthy right now is, we secured some central funds-- \$60,000 to be exact-- where we can provide free captioning to campus units. And we have a contract with 3Play Media. But basically, people can apply to have their captions made freely. And so they have to show that they have a high impact video, and it has maybe high risk in terms of Civil Rights complaints.

So we're not giving free captioning to somebody that's using Panopto lecture capture one-time-only video. We're saying, well, it's fine if the department wants to pay for the captioning

for that. But we also have a very responsive Disability Services Office for students. And they can respond if a student who's deaf asks for accommodations in that respect.

So we've captured thousands of hours of videos now. And we're working on that. It's been very successful. We're not just giving them a free lunch though. The people that get free captioning, they're going to have to tolerate hearing from us for some captioning parties where they learn about other ways to caption videos and help us promote video captioning across the campus.

We have one person and a lot of part-time people working with vendors directly-- I mentioned Canvas-- to promote accessibility. We try to focus then on high impact software that we're using. And at this state, we actually do a lot of work that really we think the vendor should be doing. But since they're increasing our risk and using their products, we are helping them make their products better.

Some people wonder why the vendors are producing all these inaccessible products. Well, it's not illegal for a vendor to produce an inaccessible product. There's nothing illegal about that. But it is illegal for us to be using these products that are inaccessible because of the American Disabilities Act and Section 504 before it. And so people, including the National Foundation for the Blind, is being systematic and bringing legal complaints-- civil rights complaints to various campuses.

They're not trying to target us so much, even though they are. But they're trying to get to the vendors. Because it's their expectation, and mine as well, that unless the campuses start putting pressure on vendors to make their products accessible, it just isn't going to happen. And we developed a grievance procedure that was more visible than processes we had in the past.

So who should be involved? As Terry mentioned, pretty much everybody. It's not a disability issue. It's not just an IT issue. It's a campus-wide issue. We're leading the effort in this, and we work for the central IT organization. I actually believe, in most cases, that's where the point person should be to promote these efforts. But others feel differently about that. It's not a Disability Services thing.

For one thing, Disability Services provides accommodations to only those who have a documented disability that requires an accommodation, and that they have disclosed that disability to that office. If we have a deaf person that's visiting our campus website, they are

not going to disclose their disability to that office. They're going to expect that you have captions on your videos. So that's the proactive part.

So the president, academic affairs, your senate, your councils of various sorts, your central IT unit-- as we're from-- marketing folks, students affairs, students themselves, online learning programs, the ADA compliance officer should be engaged-- as Terry mentioned in our case-- and libraries are procurement, and it just goes on and on.

So our key aspects of our approach is to promote accessibility within the context of universal design, civil rights, and inclusive campus culture. So we're looking more broadly than just looking at IT. With our accessible technology services, where Terry and I report as the lead, we provide a resource. We provide a catalyst.

We provide community-building activities that support the efforts of Disability Resources for Students. We develop and evolve the ideal state, where our campus should be, and what the gap is-- so what we need to work on, essentially. We create a list of IT products developed, procured, used, and prioritize those products, and determine a strategy for remediating inaccessible features, and assign specific staff to work on specific products.

We lead this-- co-lead actually, this top level IT accessibility task force and make sure key stakeholders are included on it. We have clear direction on what that task force is doing, and we provide annual reports. We meet once a month and communicate online between those meetings. And we have IT accessibility liaisons across campus. Those liaisons have made a commitment to continue to learn about accessibility, to promote accessibility of IT in their units, and to come to three half-day meetings of the three major quarters on campus here, and learn more how they can promote accessible IT.

TERRILL I just want to--

THOMPSON:

SHERYL We also develop partnerships.

BURGSTAHLER:

TERRILL I just wanted to say a little something about one phrase here that's on this slide before you
THOMPSON: move on, and that is, assigned staff. On behalf of our colleague, Hadi Rangin, who works with us at Accessible Technology Services. He's formerly with the University of Illinois. I think many of you may have crossed paths with him.

But assigning staff means assigning the staff who is otherwise responsible for that product-- so essentially is empowering the infrastructure. If somebody within the organization is responsible for a particular software application, that should be the person who leads the effort to ensure that that application is accessible, because they're responsible for that application in all sorts of other ways too.

So assigning staff isn't assigning staff within Accessible Technology Services or placing all the burden on the accessibility person, but the accessibility person kind of serves as a catalyst for engaging everybody else on campus. I just wanted to stress that, that it really is something that everybody needs to be involved with.

SHERYL

BURGSTAHLER:

Yeah. And it might be multiple people that are assigned different roles. And our role in these efforts tends to be as the consultant to provide a resource. Because the person who's managing that particular software product doesn't necessarily initially know think about accessibility. But they still should be the point person for that product, as Terry said. But then we're there to help them with the accessibility issues and move forward with that.

So we develop partnerships and empower stakeholders within their roles in this distributed computing environment. Our liaisons are the most visible group. But we're continually trying to develop partnerships with people. And again, empower stakeholders-- we're not trying to create a central service where they are always dependent on us, which sometimes is the way the conversation starts. They would just like us to do it, whenever that happens to be.

And then we have our website that Terrill shared with you. We've developed our IT accessibility guidelines and standards, later followed by a policy that links to those guidelines and standards. We offer training, consultation, captioning parties, capacity-building institutes and other events.

Some of these, like capacity-building institutes, are designed to bring in new people that haven't yet talked about or thought very much about IT accessibility. But we bring them in to kind of teach them the broad issues and how they can be engaged in this effort. And many people that would be in a capacity-building institute then can move on to be an accessibility liaison after they get that initial training.

And I mentioned, we already have several user groups we support, including one now that specifically focuses on captioning. And then we have staff that proactively tests websites. So

one of our staff members will go to a website-- a high level one, high impact-- look for accessibility issues, learn who the webmaster is, contact them, help them learn how they can make their website more accessible with a goal that they would make more accessible web pages in the future. We have a similar effort-- one person on our staff does the same thing for PDFs. And both cases, they offer remediation. And we look for other resources like online training and so forth that can support those efforts.

We prioritize efforts now with our Washington policy number 188, which was approved in August of 2016. We analyzed that policy. We actually had input on it along the way. But what we did with our ideal state document, then, is to kind of recreate it, looking at the policy processes that were due on December 31. And so we met that deadline, including naming a coordinator for policy 188 on campus, which happens to be me-- supported my group, Accessible Technology Services.

We need to have a comprehensive plan, including IT accessibility audit, which is due on March 31. That's an initial plan, and so we won't have everything done. But we'll have the roadmap that we've actually already established. But we'll make that public on our website.

We conduct statewide capacity-building institutes. We have the most expertise here on our campus, being the largest institution, and having worked on accessibility issues since 1984, actually. And so we held a capacity-building institute for the whole state. And the people that came to that meeting were people that are the coordinators for policy 188 this year.

But we had capacity-building institutes the two years before. And in both of those capacity-building institutes we had people come in pairs. It was kind of a couples party in that they had to have someone from their IT organization and someone from the Disability Services Organization so we could hammer out these issues.

It was interesting to note the number of people who had not met each other from those two organizations that met, basically, at this event. Because we wouldn't let people come unless they had that partner. But that's exactly what we expected, because Disability Services people don't tend to communicate that much with our IT organizations unfortunately. So that kind of forced that issue.

We developed our internal roadmap document, as I mentioned. We developed an aspirational policy, and the procedures are linked to the guidelines and the resources. In all cases, we're building on current policies and procedures. That actually makes it harder, by the way,

because you have to analyze those processes and procedures. But we're not looking at creating a whole separate little world on accessibility. We're looking at security, for instance-- how we handle campus IT security, and using that model for developing procedures for IT accessibility.

And so we build on past accomplishments. If you look on our website, there'll be a historical perspective, way back to 1984-- what things we've been doing on our campus. That's something that we were looking through the resolutions that we mentioned earlier. Because those people, those institutions were expected to develop plans. And we thought, well gee, we've done a lot of things in the past. Let's document that first, and then move out into the future as far as our plan. And we offer incentives, as I mentioned in the video captioning project, to do some free captioning. Well, that in a nutshell, is what we're doing at the UW. Terry will now share some resources with you.

TERRILL

THOMPSON:

And the main resource I want to share, really, is just the URL, I think, of our accessibility website. That is at UW.edu/accessibility. So it is very easy to remember. But this is kind of the hub for how we communicate, mostly to our own campus, although a lot of these resources that we've developed are applicable to the larger universe as well. And so feel free to peruse the site and see what all-- you might be able to benefit as well.

A lot of the resources that we provide are sort of how to docs for how to do specific things. For example, creating documents-- we've got some how-to documentation in that area that talks about how to use Microsoft Word appropriately to create an accessible document. And if you're exporting to PDF, how to do that in a way that preserves the accessibility information within your document. And if you need to remediate a PDF using Adobe Acrobat Pro, then what are some steps for tackling that.

And we do the same thing with websites and video and so forth. The website is also under the Law Policies and Standards area. It's a place where you can actually get our breakdown of all the OCR and DOJ complaints and resolutions. So kind of the thought process that went into our coming up with the five lessons learned-- those five action items. That's all documented on our website as well.

Also, one of our more popular resources is the IT accessibility checklist, which essentially takes WCAG 2.0, level AA. And everything we have in that checklist maps to WCAG 2.0, level AA. But we're not just reciting WCAG 2.0, level AA. Because we find that on our websites and

our web applications, some of the success criteria within WCAG are not as relevant as others.

And so we don't want to burden our audience with a lot of details. In some cases there are lots of issues that can be combined-- a lot of success criteria that can be combined into a single item on a checklist. So basically we've taken WCAG, and we've translated it into a useful resource that we think is easy to digest, easy to understand for people on our campus.

And we also use that resource as information to support our accessibility language within RFPs. And so we have some recommended language for how to reference accessibility within RFPs. And we essentially say, we need the product to be WCAG 2.0 level AA compliant. And for more information on what that means, see our checklist.

And then this becomes a good resource for vendors as well. So they can read that and understand what our needs are without having to stay up late, trying to make sense of WCAG 2.0 itself. So anyway, there's a lot of information on our website. So feel free to check that out. Again, it's UW.edu/accessibility.

And that is the main resource we want to leave with you, as well as our emails. Both Sheryl and I are available. If you have questions afterwards, we're happy to answer those. Although, we have a little bit of time for Q&A here still today.

LILY BOND:

Thank you so much, Terrill and Sheryl for a great presentation. There have been a lot of questions coming in already, and we will get to those in a second. I just want to encourage everyone to continue asking questions as we go through Q&A. We'll keep an eye on the questions window and make sure they get answered.

So to start, someone is asking, who should be responsible for conducting an IT audit?

SHERYL

I'll start answering that. My personal opinion is, it should be someone designated by the

BURGSTAHLER:

central IT organization. I think they're in the best position to do that. And I would encourage them not to think about every little product used on campus but the high priority one. My guess is, particularly if you have a larger campus, you've already done an IT audit of systems regarding security.

And so we were able to get two lists-- and I'm not sure why they divided it into two-- but two lists from our central unit within UW IT of high priority, the most widely used IT on campus. We also have our own experiences-- Terry and Hadi and Dan and others in our units, in helping make certain products deployed by our organization, or even developed by our organization,

more accessible. And so that was the third list.

So we took these three lists and have decided those are our high priority projects. In other words, we've prioritized them to be high priority. Then we will put them in order by level of priority as well.

But back to your question, I think it should be IT organization. But I think you need to designate a point person. In my case, it was me and my unit. And so we're leading that charge. We're not doing all the work, but we're leading the charge.

TERRILL

THOMPSON:

Also in order to answer that, I think it's important to ask, what does the audit contain? And the first step is just gathering a list of products. So what is the IT that we're talking about? That doesn't require somebody that has a lot of accessibility expertise. It's just somebody with some connections and some organizational skills to put together a list of products.

And then kind of our approach to this-- because then we're going to have hundreds, maybe even thousands, of products, and it's unrealistic to do an accessibility evaluation of each of those. But we're going to have several steps in this process. One is just collecting information.

So a lot of companies do have VPATs. I used that acronym earlier. Apologies-- I didn't spell it out. But it is the Voluntary Product Accessibility Template that a lot of vendors have filled out. So it's a self-report on their accessibility, particularly as it applies to section 508 of the Rehabilitation Act. And these aren't necessarily reliable in and of themselves.

A lot of companies assign this to their marketing group, or just don't know enough to fill it out in an informed way. But it's something. And so, kind of a first step in our process is, let's collect VPATs from the hundreds of products and services that we've identified, and at least we've got those on file as a starting point.

Another piece is gathering links to their accessibility resources online or to independent resources that talk about accessibility of products-- so user forums, that kind of thing. Both of these pieces-- finding VPATs and collecting information off of the web, probably are student projects-- things that anybody-- again, they don't need a lot of accessibility expertise. They can be trained on identifying what a VPAT is. So two is not a high level task.

But then when we get in deeper, as we prioritize products and have to then actually sit down and evaluate them and test them, then you're looking at somebody who has more accessibility

expertise that's going to need to be involved in that piece of the project. So lots of different parts to conducting the audit, and probably different players who are involved along the way. But somebody who organizes all this, who I think really just needs to be sort of a project managing person-- and as Sheryl said, within the IT group is ideal because then they're well connected with all the players that need to be involved.

LILY BOND: Thank you both. Another question here. In the absence of an Accessibility Technology Services Department, who would you recommend should take the lead on an accessibility initiative like this?

SHERYL Well, I could tell you how we got started in accessibility here at the University of Washington.
BURGSTAHLER: I've been here since 1984. I was only 13 at the time, by the way. But I came to the university soon after the Macintosh was introduced to start to Micro-Computer Support Group. Because until then, we were a mainframe shop with a lot of Z19 and Z29 terminals out on campus.

So I had some background accessibility. So I made that part of my job description. I just put it as a bullet point my job description, to make sure that faculty, students, and staff had access to technology. That was pretty easy to do because there wasn't a lot of it out there by then. Most of it was on the Apple II computer, frankly.

But anyway, so I think the point is, you just decide who's the best person to do that? And put that as part of their job description. The staff that I had-- I had a technical staff-- but none of them were except exceptionally enthusiastic about accessibility. And so I waited until I was hiring a new staff member-- that's a really good time to get somebody to buy into whatever you want them to do. And so they would be the point person on accessibility. The person that I hired had no background in that area.

But there were some good resources online. There's a closing the gap catalog, for instance. I like it because it's not every accessible product on campus or they might use on campus. But it has a sampling of them. And there are conferences like the [INAUDIBLE] Conference on Technology and People with Disabilities. So there are options for people to get trained on the topic. So this person just gradually learned more and more and did that type of resource.

I would pick someone has something to do-- a good person might even be somebody that's a webmaster within central IT. Because a lot of the inaccessibility problems come with HTML and the websites themselves. And included in that would be that PDFs that are posted on websites, and even the videos. And so that is a person that comes with some foundation

information that they can build on. It's hard for people to really get into web accessibility if they have no background in HTML. And I'd choose somebody that's really enthusiastic-- that they think this is kind of a cool thing to do. Because for a technical person, it's not like it's difficult to learn these things. It just takes a lot of time and dedication. Terry, do you want to add to that?

TERRILL

It's been interesting to see how this has played out at Washington, within the state of

THOMPSON:

Washington. Because with policy 188, the end of year 2016 deadline-- one of the things that we had to have done by December 31 was identify an IT accessibility coordinator.

And for a lot of institutions who don't have anybody whose job description says that they're in charge of technology accessibility, it's just been interesting to see how they chose somebody. And it really is all over the map. Although, I noticed that a lot of the community and technical colleges in particular have their CIO identified as that person. And a lot of those people have really been beefing up their skills on accessibility, and in some cases doing a lot of the work themselves.

But in other cases they are just sort of envisioning themselves as the leader of this initiative, this effort. And then they're empowering the people that work for them to learn about accessibility and to apply accessibility to the work that they do. And I kind of like that model that the higher the position, and the more authority that person has, the more likely they are going to be to actually get results.

LILY BOND:

Thank you. Another question-- how many people do you have on your staff dedicated to IT accessibility?

SHERYL

This is a difficult question to answer because people are working on IT accessibility part-time in some cases. I direct Accessible Technology Services, which has two centers-- the Access Technology Center, which provides support for faculty, students, and staff on campus related to IT. But I also run the DOIT Center, which stands for Disability, Opportunities, Internetworking, and Technology.

BURGSTAHLER:

And in that center, we have grant-funded or externally-funded projects to promote the success of people with disabilities nationwide. We get a lot of grants to do that. And so we can beg, borrow, and steal from not that pool. We have a tremendous amount of expertise, but a lot of that expertise was developed and acquired through our grant projects. Terry, for instance, is about 80% time on grant-funded projects-- working nationwide on a lot of these IT efforts that we do on our own campus. So that gives us a lot of flexibility.

Besides him, we had a manager of our Access Technology Center, Dan Comden. And we have a showroom of assistive technology, and we do a lot of training and so forth there. So he's full-time. Hadi Rangin is our vendor contact on accessibility-- works with vendors primarily. He also is in the Access Technology Center

We do have someone focusing on videos, but he only focuses on it one day a week. Doug Heyman is his name, and he works one day a week on captioning for the campus. But the other four days he's actually providing technical support to DOIT kids-- so kids in the DOIT Center that have technology. And then we have two people that are focusing proactively, one on web design, as I described that project. And then the other one on PDF accessibility, and other document accessibility I should say.

We coordinate a lot of our efforts with the Disability Services Office. And so we do things for them like help them with the-- we provide the Braille equipment for Braille on campus, and help them even do some Braille in a pinch if they're short-staffed. But we have a lot of people over there doing IT accessibility. But again, their focus is on providing accommodations for students with disabilities. So they have an IT accessibility lead who works on captioning, but also PDF accessibility. And they have about 10 students who work with them in those efforts. And we have about the same number of students working with us. So it's kind of a mix.

LILY BOND:

Thanks. It is 3 o'clock Eastern time on the dot. If you have to leave, we understand. But we're going to stay on the line for a few more minutes to answer a couple of more questions, and they will be included in the recording.

So the next question here is, have there been any efforts to incorporate accessibility standards into accreditation requirements?

SHERYL

This is Sheryl again. I'm assuming Higher Education Accreditation requirements?

BURGSTAHLER:

LILY BOND:

Yes.

SHERYL

Yeah. We have not focused on that area. But I do know of some people who have. And I don't

BURGSTAHLER:

know the state of the art there. Maybe Terry can add to this. But yes, there have been some grant-funded projects that I'm familiar with that have worked on accreditation. Terry, do you know of any particular players in that?

TERRILL Unfortunately, I don't have that information either.

THOMPSON:

LILY BOND: OK, thank you.

[INTERPOSING VOICES]

Sorry, go ahead, Sheryl.

SHERYL I said, that's a good idea, though, if you want to pick up that baton and go with it.

BURGSTAHLER:

LILY BOND: Several people are asking if you are able to share copies of some of your internal documents? So your Annual Accessibility Report and the vendor form that states the ADA agreement by which they're supposed to abide. Are you able to share those with people?

SHERYL We can share some things, somewhat privately. In other words, if you send me an email
BURGSTAHLER: message, I might be able to share it with you. We are putting things up on our website. As far as our annual reports, I think we have four of them now on the state of IT accessibility, according to our task force-- what the task force has done during the year. If you look over on the website, over toward the right, the Highlights section. If you look through there, each year that we have those reports there's a link to those reports. And so we have that. What other specific things?

LILY BOND: The vendor form was one.

SHERYL Well, the VPAT-- the vendor form that Terry was talking about-- is actually publicly available.
BURGSTAHLER: It's the form that people have to fill out if they want to sell IT products to the federal government. Terry mentioned 508. It's also the Rehabilitation Act. I mentioned 504. 508 is not civil rights legislation. It is procurement legislation.

And it has to do with procurement by the federal government. They have to procure accessible products. And so those are public. If you look up VPATs you can get that information. As Terry mentioned also, a lot of these products have accessibility now on their websites. And so you can see what they say about it.

We are developing a database-- and that might be what you're referring to. We don't have the fields identified yet, but we're working with several other institutions to come up with a

database where we can keep track of the information about accessibility of specific products.

I'll add to what Terry said in that in lieu of having somebody that's really knowledgeable about accessibility, you can join a discussion list. And the one I would recommend is ATHEN, A-T-H-E-N. And it's a group of individuals who perform duties as far as accessible technology on campuses nationwide. If you join that list, many of the discussions on that list are simply things like, we are thinking of purchasing product XYZ. Does anyone have an experience regarding accessibility of that product?

And so even if you don't have your own accessibility people, you can keep track of what other people are telling you about accessibility. I think there are a lot of things that you can do-- we've mentioned a number of them-- without having that accessibility expertise, and that would be one of them.

TERRILL

THOMPSON:

There are also lots of conversations that have been historically, over the years, related to sharing test results. And ATHEN is one of the organizations where that conversation has been front and center.

Another is EDUCAUSE. EDUCAUSE, the IT association for higher education, has an IT accessibility constituent group. And that is primarily a discussion list, although they also meet once a month. But a lot of conversations there have centered around-- we're all testing products, or many of us are testing products for accessibility, and there's a lot of redundant testing. We're all collaborating with vendors and in a lot of cases doing that in isolation, rather than getting together and sharing that effort in contacting vendors en masse and working with them.

So I think both of these channels, through ATHEN and EDUCAUSE, are great places to see how we can work together, how we can collaborate to improve the state of accessibility out there. So a lot of people out there who are working on this problem-- and sharing has been kind of a problem. It's never really gotten off the ground even though it's a great idea. There are a lot of people that have some reservations about sharing, just from a liability standpoint. You know, what if we say bad things about a vendor? Is that going to get us in trouble?

So there are all sorts of issues that would need to be worked out. But it is a very active conversation that's happening in these other places. So I encourage you to check both of those out-- ATHEN and the EDUCAUSE IT Accessibility Constituent Group.

LILY BOND: Thank you. Those are both great resources. And I think we'll take one last question before signing off. Someone is asking how you handle textbook platforms that are often required by instructors but that students purchase?

SHERYL Well, that effort is mostly within the--

BURGSTAHLER:

TERRILL Textbook platforms--

THOMPSON:

SHERYL Because it falls within the accommodation for students with disabilities. And so we're

BURGSTAHLER: peripherally involved in that. And we're involved in some organizations that promote making textbooks accessible to students with disabilities. And Terry, I think you were going to say something to add to that.

TERRILL I was just going to say-- it kind of speaks to sort of our partnership with Disability Services in

THOMPSON: that they provide accommodations. So students-- if they're using a platform that has accessibility issues, then they are going to be working with the instructor to make sure that the student has access to the materials that they need and the resources they need.

But then we come in, more sort of as we're looking at different e-text platforms, for instance, and evaluating products, working with lenders. We're sort of tackling things from that end to try and ensure that the tools that we ultimately use and deploy are accessible. So it's a two-edged sword.

Until everything is fully accessible and all the tools and platforms we use are fully accessible, then there's going to be a role for disability services to provide accommodations. But we're trying to address that on the front end and make sure that things are accessible. And we have been involved in some of the e-text piloting projects, for instance. And where accessibility barriers were found-- that was, in a couple of instances, significant enough to have an impact on whether we proceeded. We can't take full credit for stopping a pilot in its tracks. But I think the fact that a product was not accessible did contribute to that ultimate decision.

LILY BOND: Well, thank you both so much for just a wonderful presentation and a really thoughtful Q&A. It was great having both of you on the line.

TERRILL Thank you. Appreciate the opportunity.

THOMPSON:

SHERYL Thank you.

BURGSTAHLER:

LILY BOND: And thank you everyone who joined. You will receive an email tomorrow with a link to view the recording. And I hope that everyone has a great rest of the day.