

LILY BOND: Welcome, everyone, and thank you for joining this webinar entitled "When the Department of Justice or Office for Civil Rights Makes a Visit-- Lessons Learned in Resolving Complaints About Inaccessible IT." I'm Lily Bond from 3Play Media, and I'll be moderating today. I'm joined by Sheryl Burgstahler, who is the Director of Accessible Technology Services at the University of Washington, Dan Jones, who's the Chief Digital Accessibility Officer at the University of Colorado Boulder, and Janet Sedgley, who's the Manager of Accessible Technology Services at the University of Montana.

We have about 45 minutes for the presentation today. And then we'll save 15 minutes at the end for Q&A. And with that, I'm going to hand it off to Sheryl.

SHERYL BURGSTAHLER: Hello. This is Sheryl Burgstahler. I come from the University of Washington. And my co-presenters, Dan Jones and Janet Sedgley, come from the University of Colorado Boulder and the University of Montana. My university has not actually had a visit from the DOJ or OCR. But Dan and Janet have had experiences where there has been a visit. So the lessons we've learned are a little different. We're hoping that what we have to say will benefit other people who might be looking at such a visit or trying to plan their accessible IT services.

So if we look at the next slide, we look at these different institutions-- University of Cincinnati, Youngstown State University, University of Colorado Boulder, University of Montana Missoula, all the way down to University of Kentucky, Harvard University-- and ask the question, what do these schools have in common? They're all post-secondary institutions. They have all had a visit from the Department of Justice or Office of Civil Rights regarding the inaccessibility of their IT, and have had to develop resolutions with these two units as far as moving forward what they're going to do to take corrective action in that regard.

So on the next slide, we can ask, well, what is the legal basis for all of this? Why do we need to make our IT accessible on our campus? Well, there's Section 504 of the Rehabilitation Act. And the next item that will appear on the slide, the Americans with Disabilities Act and its 2008 amendments, and the next item, state and local laws.

Now, each of you would be subject to different state and local laws depending on where you reside. But the first two laws apply to all of us. Most of us have heard most about the Americans with Disabilities Act in 1990 and its 2008 amendments. But it reiterates to a great

deal what we already were obligated to provide in section 504 of the Rehabilitation Act of 1973. So there are a lot of years we've had to make sure that our programs and our resources are accessible to everyone on our campuses, including those with disabilities. Although the acts themselves, the laws do not specifically mention the internet and IT, they provide general guidelines that make it clear that we need to provide whatever we're providing to other students, faculty, and staff, that we provide the same access to individuals with disabilities.

So I think it's helpful to look at this next image, which shows ability on a continuum. Unless you're working in a compliance office on your campus, those of us in IT and other supportive services can benefit by just imagining that when we teach online or we provide a website, that there are people that are coming to that resource with a variety of abilities. And so those would be the abilities to see. We go with someone who has 20/20 vision way up on the right, to down toward the left where there's some vision loss, or way off on the left would be total blindness.

Everybody in the world also has their ability to hear, walk, read print, write with a pen or pencil, communicate verbally, tune out distraction, learn and manage physical and mental health. All of us have a position on this continuum for those particular abilities. Some of them you can see are associated with a disability, like the ability to tune out distraction is associated with Attention Deficit Disorders. But again, unless you're working in a compliance office, we need to just imagine that people with all these types of characteristics are coming to our IT services.

So what's the definition of accessible? According to the Office of Civil Rights and Department of Justice, "accessible" is a very broad term. But it basically 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 as a person without a disability in an equally effective and equally integrated manner with substantially equivalent ease of use. The person with the disability must be able to obtain the information as fully, equally, and independently as a person without a disability."

That's a pretty broad definition and sets a pretty high standard for us to reach in making sure that our IT is accessible to everyone. So if you say, well, exactly what is required? The answer is basically whatever service through your web pages or other IT you're providing to other people, it needs to be available to someone who has a disability.

There are basically two approaches to access. Traditionally in our post-secondary campuses, we provide accommodations to students with disabilities. So this would be after the fact, if a

student has a difficult time accessing course content or a website, they can go to a special office. And that office will arrange for accommodations that could benefit them so that they can access the information.

The other approach is universal design, and both of these are important. The next slide tells us what universal design means, for those of you not familiar with it. It's been mainly applied to architecture, but has been more recently applied to courses, instruction, physical spaces in our post-secondary institutions and online resources.

In all of these cases, the 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." And so on this slide, there's an image of an iPhone, which is a good example of a technology that actually is building in universal design features. So your phone can talk to you occasionally. You can adjust the size of the text on the screen and so forth. So it's adaptable to the person that has a special need.

On the next slide, it makes the point that universal design is on a continuum. This first image shows a person in a wheelchair trying to open a door. And he's leaning over. It kind of looks like he'll probably manage to open that door, but it isn't particularly convenient to him. The second picture is of a push button, which provides greater access. So someone could push this button and the door would open. And the last image is of a person walking through what we have grown to expect from a grocery store, that you walk up to the door and then the doors just open automatically. They sense your presence.

If we compare this to a video production, we could have an uncaptioned video, which is accessible to most people. But if a student with a disability was in the class that required captioning, then you'd go to the next item, [AUDIO OUT] interpreter for the deaf student-- a little bit awkward, perhaps. You have to have an interpreter, so another person is involved. But still, it would provide access to that student.

And the last example is we'd caption the video. In the case of captioning, then that student who is deaf and other students could benefit from those captions. This is particularly important if you put information out on the internet, let's say on a website for students in a class, because everyone in the class will be able to access those captioned videos any time. And so the person who's deaf does not have to arrange for a sign language interpreter in order to access the content. So that would be much preferred.

This is also preferred if you have a video on, let's say, your president giving an address to anyone who might come to the website. Since that's available to the public, it's important to remember that the public includes students with disabilities and others with disabilities who might want to access it, including those who are deaf.

So the University of Washington has taken several approaches to ensuring that our technology is acceptable to students, faculty, staff, and visitors with disabilities. We have not yet had a civil rights complaint. But we've learned a lot from the schools that have. So we promote accessibility within the context of universal design, civil rights, and inclusive campus culture. That is the framework that we use in all that we do as far as inclusive IT.

The second item that we address is with the UW-IT's Accessible Technology Services as the lead-- that's the organization that I direct-- we provide resources. We provide a catalyst. And we provide community building for the [AUDIO OUT]. This includes support efforts of the Disability Resources for Students. We develop and evolve an ideal state and gap analysis of the services as far as IT. We create a list of IT products that are developed, procured, and used, prioritize these products, determine a strategy, and assign staff for either working with the vendor or otherwise making that technology accessible. We also lead a top level IT accessibility task force with key stakeholders and clear direction and regular reports that go to high level administrators.

The other key aspect of our program is with UW-IT's Accessible Technology Services as the lead, we develop partnerships and empower stakeholders within their roles in a distributed computing environment. For instance, we're working with the School of Social Work, along with Disability Resources for Students, to help them be more proactive about making their PDFs accessible to students with disabilities in online instruction. And they've been very motivated to do this. And so we work with them to help them accomplish that task.

We also provide guidance on an IT accessibility website. We develop IT accessibility guidelines and standards and get those approved by high level administrators and post them on our website. We offer training and consultation. We support a user group that meets once a month and has online communication as well.

We host captioning parties where people can caption their videos. We have meetings with Hadi, who's one of our technical staff people who happens to be blind himself. So people can test their websites and get assistance in making it more accessible. And we proactively test

websites and PDFs and other technology and offer remediation to a certain degree.

Just this last slide, as far as the University of Washington, is just an image of the website that I was talking about. And you can see that we include things like what our goal is and what we mean by an inclusive university, how you can get started, how you can create accessible documents and videos and websites. How do you manage for accessibility in your unit? How do you procure accessible IT and so forth?

And at the end of this list, you see that we provide also information about the laws, the policies, and the standards that guide the Office of Civil Rights and the Department of Justice as they visit campuses where they consider their IT not as accessible as it should be. I'm going to turn the next slide over to Janet from the University of Montana so she can share their experiences.

JANET SEDGLEY: And I will say that as we started off on our adventure, that we did look at the websites at the University of Washington and work done by a number of other institutions that was very helpful. So thank you, Sheryl, for having done that.

SHERYL Well, you're welcome.

BURGSTAHLER:

JANET SEDGLEY: So I just wanted to talk a little bit about the timeline of what happened at the University of Montana, then some of the particulars of our agreement, and then lessons that we learned. So we had an OCR complaint filed against us in the spring of 2012. And we formed an EITA task force. We called it a working group, which ended up being quite a lot of work to help draft the UM policy and response and coordinate necessary support activities.

And then in March of 2014 we signed a resolution agreement with the Department of Education Office of Civil Rights. And for our campus, that's when a lot seemed to start. But for those of us who had been working on it, we had a good year of work ahead of that, even a little longer than that. But our resolution agreement was the first ever requirement for an EITA coordinator, and I was designated that.

But our group that worked together for a long time, the working group had a nice mix of our Online Education Department, IT, DSS, somebody from the ADA team, people from the library, a technical staff from the library and library faculty, a distributed IT person, and the web personnel kind of floated in and out. So it was really a nice mix of people to work on that.

And also, I mentioned there that helped draft the UM policy. One of the interesting things to me-- I'm not sure if it was to others as much-- was just that part of the resolution agreement included the fact that UM policy would be created automatically in this process. And, as I calculated it out, it ended up happening in the middle of summer. And it was, in talking to our legal counsel, it was kind of the first time that a policy had sort of just been created between campus and an outside entity, but then automatically became campus policy. So that was kind of different.

Then we also had to, through the process, provide different reports as we went along about what we were doing related to areas such as web accessibility, classroom IT, online IT, the grievance policy, things that were mentioned in the resolution agreement. And our timeline was quite fast. Most of our reports were done within the first year, although we've just done a few more. But it was a pretty fast timeline.

And then in March of this year, we will provide a full report talking about anything that has not been met. And at this point, the biggest thing is just this audio descriptions. We haven't quite brought that onto campus very much.

So let me share some of the details of our resolution agreement. And one of the very first requirements we had was to include accessibility requirements in all IT procurement. And that was quite an interesting [AUDIO OUT], especially since it was the first one. And it wasn't something that I or anybody on my team had had a lot of experience with.

We have since heard that some campuses have said that-- there was another campus that just said they weren't going to do this requirement. But we went ahead and we did set up a process six weeks after the resolution agreement. And it's been a very organic process, partly because it started so early on in this process. And we were still working together on how to approach these things.

Another specific was that we had to survey current and former students about their experiences with barriers due to inaccessible IT. And it was the students who had brought the complaint to the Department of Education. So we already had some experience and knowledge of what didn't work for them. But it was helpful to go back and do this survey.

And one of the things that I noticed in it was a lot of what was reported was due to inappropriate knowledge or incomplete knowledge. So students would say they couldn't

access such and such or something didn't work. And then reading their response, we realized we just hadn't educated them well about how to do certain things. So that was kind of an eye opener.

We also had to perform an audit of all IT on campus, which we did with a lot of web forms and a lot of departmental visits. So that was kind of a process. And we created a remediation plan based on the results of the audit. So the audit happened. The resolution agreement was signed in March. The audit happened that spring. And we had to have a report due by the end of June.

So that was, again, pretty fast. But it had been accomplished with trying to meet with every department and going around and talking to faculty senate, staff senate, our technical partners group, just a bunch of information. So sometimes it was hard to sort out which we learned from audit and which from talking.

So we set up a remediation plan and we followed that pretty well. Although as we get going, we start doing things that weren't even listed there. So one thing that's happened is we've created the Accessible Technology Services part of IT, which I manage. And we've actually just recently moved two individuals from disability services over into that section, one who does our document remediation for students, and now for campus, and the other who is our assistive technologist.

And then, just to show how quick our timelines were, we had to ensure document and web accessibility by the end of the year that had the resolution agreement in it. So it was, like, nine months later. And when you're trying to get all of campus to pay attention [INAUDIBLE], that was kind of an interesting time frame.

But what we've learned as we've done this is in the next slide. One of the things that really-- I can't say it enough-- that helped so much for us was that there was a lot of teamwork that already existed. So the people that were part of that main group had worked together for a while. They had connections. We'd collaborated on other things.

We had the support of our legal counsel, who initially was in most of the meetings. And she had actually come up through the ranks and had been our EEO officer. So all of that helped. A lot of teamwork helped move along well.

Then we had an individual on our campus who works in UM Online and does our online

courses, and has been a strong accessibility advocate. And she actively partnered with our LMS vendor with Moodle Rooms. Because Moodle was one of the complaints brought forward. And did a lot of great work with them so that Moodle Rooms in itself has become more accessible, not just for our campus. So that was really powerful.

Then we did both the top down and bottom up approaches. Like I said, we went around. We met with the president. We met with the faculty senate, staff senate, all of those different big campus groups. But we also were open to going into a department. And we also just met with people one on one.

And when I say all of this, I have to say, at that point, there was really only me and one other part time staff person. And so our group that met was a working group for quite a while, even though they were from a variety of other departments and this wasn't their main job. Although they didn't do as much of the direct support and the direct presentations, they were a little bit in that. So that was something that we tried to hit from all different angles and really be available. But I got a lot of overtime initially, I will say.

Then we had a consistent message-- and this was part of the requirement-- to have it linked to our accessibility site. So our web pages, at the bottom, they all have a link-- almost all have a link to our accessibility site. So it's available from almost anywhere on the website for campus. And that has been really helpful.

And our DSS structure thinks that we're also unique in the fact that the word "accessibility" has somehow managed to just stay with this meaning. And there's so many different ways accessibility can apply anymore that she thinks that's helped us kind of be centered pretty well on what we're trying to do.

We also built relationships, again, just by reaching across campus. And we had great people. For example, we had faculty members come to us and suggest that they thought a certain thing should happen. And so it was just great to go out on campus as much as we could and connect with people and work with them.

And we built on existing processes. That was really important. One of the ones that I hadn't even realized we had was that we'd always been doing IT short courses about different technical topics. So the fact that we now needed to do them about accessibility was great, and it just fit right in.

We had a help desk. Our online department had support. And we'd even started captioning. So we just built on those processes. And again with procurement, we've also kind of fit into that process as we go along.

We started and are now doing more of formalizing the involvement. So we have a listserv for campus called Access Partners. And the concept is not just electronic access, but it covers a number of different topics, sends out information and kind of keeps people united in that way. And we set up what we call EITA certification, and all people get from this is that they get listed on a web page. But they can show that they're being proactive and learning and taking our short courses and doing other things to become aware of what's happening and how to make things accessible.

And then finally, support from key leaders. Our resolution agreement was signed just as we had a new CIO. And so he has ended up being a strong advocate for us, and that has helped a lot. And we've had, like I said, the faculty members who came to us with their opinions and shared ideas. And we've had other parts of campus come forward to talk to us about how this would work better, what they need. So support from key leaders and other people on campus. It's been great to have that.

So let's go ahead and turn it over to Dan Jones to hear about what happened at Boulder.

DAN JONES:

OK. Thank you, Janet. So like Janet, I'll talk through our timeline, talk about how we responded to the Department of Justice, and then lessons learned. The first thing to understand is there was some awareness of the problem already. The Boulder campus had already completed an accessibility study in 2013. What was missing was really an agreement in terms of who owned the problem and who would respond to it. And then having an executive leader who would really champion the effort.

The Department of Justice did send us an initial notice of intent to investigate in the spring of 2014. In response to that, the campus formed a project team to not only respond specifically to the letter, but then also to start to address the problems and implement what was in our original accessibility study.

That effort, it was across the campus and included folks from IT, disability services, our legal counsel. Because we're part of a university system, we pulled in someone from the system office who's in charge procurement. And then we have faculty engagement as well.

So we formed that project team. We provided our initial response. And so we were transparent with the Department of Justice and said, here's our initial study. Here's what we intend to do. And then we provided regular updates to the Department of Justice.

We did not get a formal response from the Department of Justice until May of 2015, when they sent us a letter saying they were choosing to close their investigation. So we did not actually sign a resolution agreement. To be clear, though, even though we chose to take their closing the investigation as a sign that said good things about the direction we were taking in all of the work that the various teams were working on, the Department of Justice did make it clear that they could come back. The fact that they were closing their investigation didn't mean that they were necessarily going away forever, which we anticipated.

So next, I'll go ahead and talk about the specifics of our response. So like I said, we formed a formal project team following our standard IT practices for project management. That was actually, in retrospect, important and helped give structure to our response.

We ended up forming four sub-projects as part of that effort. The first was the policy and exceptions process. So we developed a formal campus policy regarding digital accessibility. The focus of that policy is really high level. It's setting direction, creating my role, and so really detailing out what are the roles and responsibilities for the program in order to get to our desired end state.

And then it established an entity called the Accessibility Review Board. And so that was an entity where, if we have exceptions to the policy, it's not just me granting those. That's a broader representative group from the campus.

That same team then also created more detailed standards. And so that's where you get to the nuts and bolts in terms of the details of a syllabus have to have the specific language regarding accessibility. Textbooks, any course materials need to be turned into the bookstore at time of registration. Laying out, here are the standards for how we would evaluate web accessibility. And then in terms of procurement, getting into knowing that that would be a huge issue for us in the standards we detail out, here's the specific contractual requirements that are required.

And then the standard also goes into more detail in terms of what's expected for an exception. So one, it's not open ended. Exceptions have to be reviewed every year. Exceptions have to come with a remediation plan.

So we know that not everything can be made accessible today. But we want to see that someone has a plan in place. Maybe it's that they're fixing something themselves, or maybe they're working to move to a different vendor if it's a hosted application.

And then the other part of the exception is that they have to have a plan in place to handle an accommodation request. That was one of the concerns in the original complaint was that too often, someone would request an accommodation. And the department who was providing some service really didn't know what they needed to do to provide support. And so by the time they were able to provide that accommodation, it was really too late for the student to really be successful in a class that they were in.

So that was the policy and exceptions process. And I'll say that that-- going back to the policy team-- that team included probably the broadest set of people on campus. It included someone not only from IT and Disability Services, included faculty governance, someone from our provost office. Just knowing how policies are created at universities, we wanted to make sure we had broad feedback early on.

So going on to application and technical services remediation. So this was the team that actually dealt with the specifics of the complaints in terms of working to understand the accessibility issues in Google Apps for Education, Desire2Learn, our student portal, which is Oracle PeopleSoft. There were challenges there.

This team also created our usability and accessibility lab. So we now have a lab where we can test applications doing essentially formal user acceptance testing, but in this case making sure that those same test scripts you would use also work with accessible technology. And so we have students that actually work in the lab and they're blind or hard of hearing, and so actually step through those same tests.

Accessibility support services. Similar to what Janet was talking about, we knew that we needed to reach out more to the community and understand more broadly than just what was listed in the complaint. Where were there are other issues? Where were other challenges? What other services do we need to develop? And so we did do a survey of all the campus's students and employees. And that helped inform other changes that we made as we developed an ongoing program.

Communication and documentation. So this was really just making sure that throughout the

project, we were transparent, both externally to the Department of Justice, but within the campus. And so when we received the initial letter, there was communication from our chancellor to the entirety of the campus. And then as we were developing the policy, we were putting drafts out, early drafts, and then holding multiple town hall sessions across campus to start to get feedback.

And then documentation, just making sure, like what Janet was talking about, having one place where we knew everyone could go to not only get the status of our response. But then also where we were publishing where did we know we did have issues? Part of the goal was to make sure that students or employees didn't have to figure out that there was a problem on their own, wasting time. So we have that information available. And it's linked to from every web page on our primary site.

So let's go ahead and talk about lessons learned from the effort. So first point is leadership commitment. And so, as I said earlier, we had, in a prior study that was completed, once the Department of Justice inquiry letter came in, our CFO really took ownership of this and acted as the executive sponsor of the effort going forward. And so that really cleared the way to make sure we had resources and top cover as we were moving forward. Also, as I mentioned, the chancellor was sending out communications. So we had support at that level of the organization.

Transparency, both with the Department of Justice and the rest of the community. I think that that can't be stressed enough. I expect the fact that we were proactive in our response to the Department of Justice helped in terms of their decisions to drop their investigation at the time. But also, just as we develop the ongoing program, maintaining those relationships, whether it's with our own students and employees. But then working with others, whether it's other universities, having contacts with, say, the National Federation of the Blind. All of those things help ensure that people know what we're trying to do, that we're getting good feedback to make sure that we're headed in the right direction.

And that covers the next bullet there in terms of making sure it's active engagement with community members. Another example of that is, as part of our response as we developed the programs, we have an accessibility awareness program that will be sending out communications to the whole campus. So we turned to the students who not only work in our lab, but then also work with Disability Services to make sure that the communications we were sending out really represented their voice and that we were telling the campus their

experience the way they would want us to do that.

And then, again, continuing the communication theme, just ensuring that you have wide publication of the accessibility issue and the reporting process. So not only is that having the one single website. But then for every service, as part of our support process, anyone can call up and there's now a pre-defined workflow that if someone says, there's some accessibility issue with any particular service, our front line service center knows how to deal with that in an appropriate way, how to capture that information. And then that goes not only to the service manager, but then to myself for follow up.

SHERYL

BURGSTAHLER:

OK. Now that we've heard these three stories of different campuses, I'm going to sum up the lessons learned from the three campuses. The first one is getting a commitment from leadership in key organizations, and develop organizational structure and stakeholders. I think all of us made the point to look at what organizational structure you already have-- processing and purchasing, for instance, or providing training. How can you build accessibility into what you're already doing and involve various stakeholders, including students with disabilities?

Another one was that we identify key IT software-- or IT in general, actually-- that's developed, procured, and used, including websites, PDFs, videos, learning management systems, ATMs, and so forth. And prioritize. If you do an audit of the software you're using on campus and of your websites and your PDFs, my guess is unless you've been doing a lot in accessibility already, you have a lot of things that are inaccessible.

So it's important to kind of prioritize where you're going to start. Right now, we are prioritizing websites and PDFs. So we work proactively on those, particularly high level websites and PDFs. And then we also have identified some software. The software we're working with right now, Workday, is something that will be deployed for the whole campus for people to keep a record of their hours of work and so forth. And so that's a high priority. Canvas is another priority. And we work with an international group. We lead an international group on accessibility of Canvas learning management system.

And then figuring out what level of corrective action you can take. If you're a small campus getting started, there's probably not a lot of corrective action for some software packages, particularly working with vendors. But you can always start with your websites and your PDFs and make sure your videos are captioned and so forth.

And then our task force, as well as those at Montana and Boulder, we all give reports of some

sort. Because we haven't had a complaint, we don't have to report beyond the university. But we've learned from all these other efforts and kind of patterned some of our reports from the task force on what other people are reporting from. There's a lot we can learn from these other campuses.

Create and disseminate policies, guidelines, and standards. As I mentioned, we have a website to do that. But we also promote those campus-wide. We had high level approval of the guidelines we put together, et cetera.

Providing resources that include the website training and promotional activities like the captioning parties I mentioned is important. And working on procurement. That's probably been our most difficult area. InU UW-IT, we procure a lot of software, and it's relatively easy to get in that process. But most of the IT on this campus is purchased by departments and other units. And there isn't oversight of that process. So we're still working on that.

And developing and publicizing a grievance procedure. This is often in the requirements of the resolutions at campuses nationwide. It wasn't something we've thought of, but when we saw it appearing, we thought, we'll write a grievance procedure. Basically, if a student with a disability, or faculty or staff, is not satisfied with the accessibility of IT and the services that they're receiving in that regard, who do they talk to? Figure out on your campus who they should go to next. You want them to go to someone on campus, not directly to the Office of Civil Rights. Give them an opportunity to share with an outside group what they are lacking as far as support.

So who should be involved in these efforts? Well, if you listen to our three stories, here are some possibilities. The president themselves might be involved in academic affairs, the provost, deans, and department chairs, sort of high level administrators. And then moving down a notch, your academic senate, your college council of some sort, council of chairs, et cetera, student affairs, students themselves, particularly students with disabilities, your central campus IT units. On our campus, that's a group under me that takes the lead in these efforts. But also outreach units, libraries, online learning programs, certainly the ADA compliance officer or other legal counsel, and procurement.

Just thinking of a couple questions you might ask yourself about your own campus. What partnerships on and off campus can you develop to support the IT accessibility goal? It's real easy to sit back and think, well, we don't have enough technology support or whatever to do

this. But if you really think about some of the partnerships you could form, you can get a lot accomplished without having designated staff toward this effort.

How could we get support from the administration? We talked about bottom up and top down. So if you can't get top down support, that isn't going to discourage you from going bottom up for a while. And continue to work on the high level administration because that's important as well.

What are the best sources for providing guidance? There are a lot of websites, including ours, that can give you specific ideas on how to make your campus more accessible. And I think you'll find, although the area can be somewhat overwhelming, there's plenty of low hanging fruit. So when we get discouraged by some of the more difficult problems as far as accessible IT, we look at some of our easier problems to solve, like making step by step progress on our websites and our PDFs.

So in conclusion, then, with this presentation, I hope that you've gained something from the suggestions we've made. And we've included our email addresses in the PowerPoints. And we wouldn't do that if we didn't expect you to contact us. And so if you'd like to learn more about our efforts, please do that. Now we can pause for a minute and see what questions have come up that you might want us to answer.

LILY BOND:

Thank you so much, Sheryl and Janet and Dan. Your presentations were really great, and there are tons of questions coming in. So I will start going through those. Just a reminder to everyone to continue to ask questions throughout Q&A by typing them directly into the Questions window of the control panel.

And if you're looking for more resources on web accessibility, we have several other webinars coming up, including the Legal Year in Review, which will be a review of digital assets cases in higher education that occurred in 2015. So that should be very relevant to all of you.

And anyway, the first question-- actually a couple of people have been asking, of the three of you, if they would be able to access websites or documentation, policies, procedures, and exemption forms that the three of you have used. I don't know if that's something that you're comfortable with, but I could easily include that information in the followup email.

SHERYL

Anything that we're going to share, we put up on our website that I mentioned, IT accessibility

BURGSTAHLER:

at the University of Washington. And on that page, there's actually a highlights of our

accessibility journey. And it will tell you what steps we've taken. Any procedures and processes we have are reported there.

We do have a few internal documents that we don't provide externally. And I would encourage you to make them yourself, by the way, for your campus. But one is the ideal state, where, in a spreadsheet type format, we have, where do we want to be? Make a list. Brainstorm. Make a list of what would be the ideal state of your campus as far as IT accessibility.

And then, on the second column, where are we relevant to that particular step? And what do we hope for the future? So basically, a gap analysis. And we visit that ideal state periodically, again, as an internal document. And we talk about, is this where we really want to be? How have we progressed?

The second document we have, which again is an internal document, so I can't share it with you. But as I looked through the resolutions that other campuses had to comply with, I noticed that most of them said they needed to do an IT accessibility audit. But I want to make sure that our audit, if you want to call it that, was a proactive, solution-oriented list.

And so we made the list of all the software that is procured and deployed from our central services. That's UW-IT in this case. And then we started prioritizing. We have a list of those packages. And by the way, I put little stars next to them. So it's pretty low tech, but just to give us three stars if it's really important and fewer stars for other products.

And then we kind of, as a group, me and my staff, decide which things are most important and what is our strategy going to be. And in that process, we often identify one person on our staff that will take any further steps toward the accessibility of that product.

An example is Canvas. That would be rated as a very high priority, the highest level of priority. And we go so far as to having Terry Thompson, who's on our staff, lead a group of over 100 people from around the country from post-secondary campuses, putting pressure on Instructure, the company that produces that software, to continually improve the accessibility of that product. And in others, we might communicate directly with a vendor. Some others, we're communicating with our own staff here on campus because it's something we develop ourselves. And some we haven't gotten to yet. In the future, we'd like to extend that list to have more products that are procured by individual departments. But so far, we just have a few of those.

JANET SEDGLEY: And at the University of Montana, we do have the website. If you go to the University of Montana, right at the bottom, it's going to say accessibility. And anything you find there, we're happy to share.

DAN JONES: Likewise for Colorado. And we're going through a documentation refresh. So Lily, I'll send you our program strategy and our current exception request form that people might find that helpful. And we're happy to share that.

SHERYL Yeah, Dan, I think that's a great example. I'm even going to take a look at that one too. This
BURGSTAHLER: exemption idea intrigues me.

LILY BOND: Yeah. I think that will be really valuable to people and they will be very grateful to have you share it. Thank you. Another question here. Someone is wondering if the three of you could share your thoughts, hopes, and concerns about efforts to create guidelines for accessible instructional materials at the federal level by a legislation like the proposed Accessible Instructional Materials in Higher Education Act or similar bills.

JANET SEDGLEY: This is Janet from the University of Montana. And I think-- this is just my personal reaction-- that instructional materials can vary. It's such a huge area that I think it's important just to say, here's how these different things can be made accessible. But there's always going to be areas that we need to look at because new technology, new approach. It's definitely an area to focus on a lot. But I think we can list just standards for the different elements that are used.
[INAUDIBLE], Sheryl, Dan?

SHERYL Yeah, this is Sheryl. There are standards or guidelines potentially to be developed. Even the
BURGSTAHLER: Section 508 Standards for IT Accessibility, they're in the process of being updated. Those standards, by the way, apply only to the federal government that's making purchase of IT. But some campuses nationwide have adopted the 508 standards as their standards. So that's where they relate to higher education.

So these things are good to point to. We point to the Web Content Accessibility Guidelines 2.0 level AA. For one thing, those guidelines are international. And so there's a lot of buy-in. And they seem to be more equipped to refresh them more efficiently than the 508 standards, I think, because you've got the federal government involved, and that makes it more difficult to be agile.

What I try to do for our campus and outreach that we do is to create some guidelines for

getting started. Because it's really easy, when you have standards, for them to get really deep into the technology initially. And sometimes, people use them as an excuse to not do anything.

So as an example-- you can find this on our Do It website-- I've created a document that is 20 tips for online faculty. I can send a URL to Lily after this if she wants to post it. But it gives faculty members something very concrete to do. Is it everything that they might do? No. Would I ever call it being ADA compliant? No. Is it in the spirit of the ADA? Absolutely.

Because faculty members need things different than service providers, et cetera. What it includes on the list of 20 is things like structuring their headings in their PDF documents or their websites or their Word documents, and tells a little bit about how to do that, to caption their videos and so forth. But there are a lot of things that faculty members can do, in that case, in their online learning that will make their course more accessible.

The goal is always the same for us, and that is that we want them to include accessibility in their courses not to necessarily eliminate accommodations, which would be nice, I guess, but to minimize them. If they're teaching a course and they've managed to get 80% of their videos captioned, then if they have a student who's deaf in the class, the other 20%, the Disability Services Office will probably have to deal with and quickly get those captioned. But if they don't caption any of their videos, then that's going to be a much bigger job.

So the goal should always be to minimize accommodations, as I see it, but to provide guidelines to your various stakeholder groups that are appropriate for their role at the university. The guidelines we provide to webmasters are much more technical than those that we provide to faculty, for example.

DAN JONES: And I think that's a key point is translating something like WCAG to actionable things for individual roles, whether it's faculty, web developers. Also, absent more detailed regulations, just a pitch here. I think we in higher ed have an obligation to make sure that our students, when they're graduating from an appropriate discipline, that they start to have this understanding. So when they go out to the private sector, they already have that knowledge upfront and know what they need to do.

LILY BOND: Thank you, guys. Those are great answers. Another question here, probably specifically for you, Dan and Janet. Someone is asking if the DOJ and OCR agreements specifically require that your websites pass a WCAG or functional accessibility evaluator test.

JANET SEDGLEY: This is Janet. They did require WCAG 2.0 AA standards in our case. Yes.

DAN JONES: And while we didn't have a formal resolution, that was part of the inquiry, asking what standards we were using and how we were evaluating websites.

LILY BOND: Thank you both. A similar question if you are comfortable answering it. Someone is wondering what the nature of the complaints to the OCR and DOJ were.

DAN JONES: Yeah. I can start. And in fact, I think a copy of our letter is on the website that we received. It was from, I believe, three students who specifically cited, for example, Google Apps, which was used as part of course assignments, was not accessible. The software we were using for placement exams was another example. The timeliness of accommodations was a third one. But like I said, the letter is out there if you want to see that.

SHERYL BURGSTAHLER: And if you look at our IT accessibility website, we have links to all of the complaints and the resolutions that we're aware of, about 16 schools and school districts.

JANET SEDGLEY: Yeah. And at the University of Montana, ours is out on the website too. But it was inaccessible documents, lack of captioning, inaccessible online content and content at the library, even inaccessible banking machines for student refunds, those kind of things.

LILY BOND: Thank you all for sharing. And Sheryl makes a great point. They have a great resource on their site with links to all of these complaints. Another question. At any of your institutions, was the LMS part of the challenge to improve compliance? And then a similar question. Do you have a recommendation for an accessible LMS?

DAN JONES: So this is Dan. Yes, we use Desire2Learn, and that was a specific item in the complaint. And there are two aspects to it. One, there's the platform, which we don't actually control. So going back and making sure that we get proper contract language so we could then hold the vendor accountable. But then also making sure that even if that platform is accessible, making sure faculty are aware that the content that they put on the platform is also accessible. So you need to be able to address it at both levels.

JANET SEDGLEY: I agree with Dan that content issue is a big one. But kind of following the model that Sheryl's group did, our online department worked with our LMS system and provided testing and examples back and worked collaboratively to show them what wasn't working. And so I think that approach has worked in both cases to improve the LMS in general. But the content's always still the issue.

SHERYL

Yes. And one thing to remember-- this is Sheryl again-- is that it's not a one time deal. We

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purchased Canvas years ago in part because it was very accessible. We considered it, at that time, the best of the learning management systems. And there were other things that we considered, but we are very pleased that we got involved in the purchase so we could deal with accessibility.

A few years later, we noticed that a lot of the accessibility features seemed to be broken. And so we inquired and found out that the person that was doing accessibility at Instructure had moved on. And they were behind schedule at getting the next version out of those features. And so they kind of dropped the idea of accessibility and kind of went into the "well, we'll deal with that later" mode.

So we became very active again because we had not only standardized on campus at the University of Washington, but encouraged all post-secondary schools in the whole state to use Canvas. And so we couldn't deny that it wasn't a really high risk issue to have an accessible learning management system. And we weren't about to change to a different one at that time.

So we've continued to work with them directly and helped them with very specific guidelines in how to make Canvas more accessible, working with 100 other people around the country. If you want to join our effort, just send me an email. I can tell you how to get to be part of that group.

But yeah, working directly with the vendors can help. But also, remember, once you make that choice in procurement, it will be ongoing. So we like to include in our vendor language, when we're making a purchase, that they will continue to work with us to maximize the accessibility of their product.

LILY BOND:

Thank you all. And Sheryl, that's a great point about making sure that your vendors are accessible. Someone was asking about that. I think we have time for one more question. Someone is asking what your perspective on captioning in higher ed is, if it's a universal requirement or if it's required by Section 508.

SHERYL

I'll start. This is Sheryl again. Section 508 does require captioning. But remember, those

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standards are only for the federal government. So the federal government, if they're purchasing videos or creating videos, under most situations, they have to be captioned. Your university or college only has to comply with those standards if you have adopted Section 508

standards.

First of all, the ideal situation is that all of our videos are captioned, not just for students who are deaf, but as a best practice for instruction. But where you assume the most risk as far as captions is if you put anything out in a public forum. For instance, if your president is giving a lecture and you put it up on the president's website and make it available to everyone, everyone includes people who are deaf on and off campus. So you have to caption that. It's really clear.

So any of your public, or if you have a MOOC or some other online class that's available to everyone, there again, you have to be really sure to have those captioned. But ideally, you'll put captions on your videos for all of your classes.

JANET SEDGLEY: And we found at the University of Montana that we find so many people appreciating the captioning. But I do think at some point that it's just going to become so common that it doesn't become as much a struggle except for freshly minted videos made by the professors at the university.

SHERYL
BURGSTAHLER: And sometimes it's a matter of training. You've probably all may have looked at YouTube videos that have the computer generated captioning. They can actually be very humorous because it's generated by a computer. A lot of people just don't know that the owner of that video can go into YouTube and edit those captions. And so we need to remind our faculty that they actually can do that. And they're usually more than happy to it because they don't want silly captions on their videos either.

LILY BOND: That's a great point, Sheryl. I think at this point, we're just past 3 o'clock Eastern time. And I think we should wrap up. There are a lot of unanswered questions. But I will compile them and make sure that as many of them get answered as possible.

Thank you all so much for joining. And Dan, Sheryl, and Janet, thank you so much for a really valuable presentation. People were really happy to have you share your stories.

JANET SEDGLEY: Thank you.

SHERYL You're welcome. Thanks for inviting us.

BURGSTAHLER:

DAN JONES: Thank you.

LILY BOND: And thank you all for joining. And I hope you all have a great rest of the day.