

California State University San Marcos

Web Accessibility Implementation Plan



*ATI Priority One:
Web Accessibility (Administrative)*

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I. Overview

The Internet offers the potential to make information more accessible to individuals with disabilities. Through the use of adaptive technology, such as screen readers, those with visual or hearing disabilities can obtain information that would otherwise be unavailable to them. Listening to the confusing information presented by a screen reader program as it attempts to read aloud the web page which lacks accessible design emphasizes the seriousness of the problem. Web page accessibility is accomplished by designing pages that are well organized, easy to navigate, and allow for the effective use of adaptive technologies to access the page content. Accessible design also lends itself well to multiple delivery methods.

This Web Accessibility Implementation Plan details the roles, responsibilities, and methods that *California State University San Marcos* (CSUSM) will apply to meeting the *Accessibility Technology Initiative* (ATI) deliverables. The CSUSM Web Accessibility Policy and the associated procedure (in final draft stage and will be submitted for final approval, Fall 2007), Web Accessibility for Non-Instructional Content, are referenced throughout this plan. These documents define the high level objectives for providing web accessibility at CSUSM. Since available technology and personnel change over time, this implementation plan is subject to change more frequently than the general policy and procedure sources it compliments.

II. Scope

This plan addresses the administrative websites specified in the CSUSM Web Accessibility Policy and Web Accessibility for Non-instructional Content Procedure.

III. Process for Auditing, Monitoring, and Remediation

IITS will use HiSoftware Compliance Sherriff to regularly monitor and report on accessibility compliance of administrative websites. These monitoring reports will include discovery and remediation dates for auditing purposes. Reports will be submitted to the campus CIO at least twice a year.

Web Accessibility for Non-instructional Content Procedure III.B:

Monitoring tools may be run at any interval but no less than twice annually. The CIO shall publish the results of the monitoring report to the Disability Access Compliance Committee (DACC) twice annually.

New projects will have accessibility checks during the development process and receive continued monitoring after implementation. Websites currently in production will be scheduled for review and remediation based on frequency of use and critical function needs. Contact with responsible parties for the websites, training and support, modifications, and retesting will be recorded for auditing purposes.

Web Accessibility for Non-instructional Content Procedure III.C:

Content owners must review content to ensure it meets accessibility standards prior to publication, or upon notification of any substantial change in accessibility standards.

Remediation for existing sites will be determined by the level of usage, degree of accessibility and the degree of technical difficulty involved in making the page accessible. Websites will be categorized into the following:

1. *Compliant* – Meets web accessibility standards
2. *Needs Work* – minor improvements needed
3. *Non-Compliant* – major improvements needed

IITS will maintain the remediation priority list. Alternative information will be provided by the responsible parties as needed.

Web Accessibility for Non-instructional Content Procedure V.B – V.C:

When web pages cannot be made accessible in a timely manner, the content owner will be responsible for providing alternative access to the information.

If not remediated in a timely manner, IITS may archive the content until it can be brought into compliance or they may charge the responsible content owners for the costs to remedy the non-compliance.

In order to optimize the process, the content management system software will be utilized to address repairs to websites which need remediation.

IV. Process for Accountability and Documentation Procedures

All administrative websites will have an automatic footer placed on them with a feedback/complaint form allowing for accessibility related issues. These issues will be logged and responded to in a timely manner. The discovery and remediation dates will be recorded for auditing purposes and submitted to the campus CIO at least twice a year. All submitted issues will have a designated responsible person and/or department. Issues will have records of progress made or complications preventing compliance.

Web Accessibility for Non-instructional Content Procedure IV.C – IV.F:

Where possible, campus web page shall have a link to report accessibility problems to the CIO.

Web pages that are reported as non-compliant will be reviewed by the CIO.

The CIO shall notify content owners of any instances of non-compliance. The content-owner shall be responsible for remediation according to guidelines and timelines established by agreement with the CIO. The CIO shall ensure that remediation steps are taken in a timely manner or the CIO will remediate the issue directly.

The CIO will be responsible for maintaining a record of reported instances of non-compliance and their ultimate resolution. The CIO will verify that remediation is completed.

V. Incorporating Accessibility into New Development Projects

Retrofitting projects typically involve identifying the barrier, developing a solution to the barrier, and implementing the solution throughout the website. Before implementing a solution, validation that the solution is web accessible is vital as repairs are propagated throughout the site.

New projects will have web accessibility compliance checks during the development process. These sites will be periodically assessed and brought into compliance as necessary. A final web accessibility compliance check will be done during the pre-deployment system testing phase. The site will be brought into compliance prior to the release to production.

VI. Alternative Access for Exception Projects and During Retrofit

Alternative access will usually be provided directly by the department responsible for the content or through the assistance of the Office of Disable Student Services.

Exemptions will be noted in the remediation priority list as non-compliant.

Web Accessibility for Non-instructional Content Procedure VI.A:

Content owners shall provide alternative ways for persons with disabilities to obtain information or services during any period of time where a website or contracted web service is undergoing retrofit in order to comply with accessibility standards.

VII. Identifying Remediation Needs for Critical Administrative Sites

IITS will use HiSoftware Compliance Sherriff to check all critical administrative websites on the campus web server. Itemized problems and proposed solutions will be listed along with proposed resource needs (staffing) to remedy the accessibility issues. These websites will be prioritized and scheduled for retrofitting or redesigning.

Web Accessibility for Non-instructional Content Procedure IV.B:

The CIO shall regularly report, track, and evaluate the status of campus websites and contracted web services to ensure compliance with minimum accessibility standards.

VIII. Training for Content Owners and Developers

IITS will regularly provide training for content owners and developers working on administrative websites. Training is expected to be offered at least once per semester for each of the design/accessibility topics. Content owners will receive training on general web content inclusion within the campus content management system and accessibility topics will be introduced where applicable. Developers will receive more exhaustive accessibility training on setting up templates/frameworks that comply with current industry standards and facilitate accessible content inclusion by content owners.

Web Accessibility for Non-instructional Content Procedure VII.A:

Content owners are required to maintain a working knowledge of accessibility standards. The CIO shall provide mandated and ongoing training for content owners who develop and maintain websites in order to ensure that website developers and maintainers understand accessibility standards.

Content providers will use the campus content management system for implementation of future sites. Extensive training will be available for all users of the content management system.

IX. Accessibility Communication Plan for the Campus

Accessibility requirements, support services, training, and compliance progress will be communicated with a combination of web, email, and instructor-to-student methods. A central repository of accessibility related resources and reports will be available at <http://www.csusm.edu/accessibility>. Communication of the campus' commitment to providing accessible content, requirements for faculty/staff and students, and available resources will be emailed to the campus community on a regular basis (probably once a semester).

In order to regularly reinforce the policy on web accessibility, IITS and HR training (especially new-employee orientation) will include an accessibility component to make faculty/staff aware of their roles, responsibilities, and resources. IITS will maintain the website remediation priority list. The content management project website (<http://www.csusm.edu/redesign/>) will be used for the initial transition and ongoing efforts related to accessibility compliance using the campus content management system.

X. Measuring Process Effectiveness

Before retrofitting and redesigning administrative websites, IITS will capture the baseline state of the sites to compare accessibility compliance over time. Logs of reported accessibility issues and their solutions will be charted over time. Finally, surveys will be administered to the campus community to assess the effectiveness of available training, support, and resources.

XI. Roles and Responsibilities

- **Compliance Consultants:** Administers HiSoftware tools to generate official reports for the CIO on the state of campus websites. Reviews and advises on websites during the development/retrofit cycle. Assists in development of training materials.
- **Testers:** Uses ADA checklist(s) to browse through websites for the more “useable” aspects, catching potential issues that software verify tools cannot process.
- **Monitors:** Uses the HiSoftware Monitoring and Verify tools to generate compliance reports for minimum ADA standards.
- **Trainers:** Trains the content owners and web developers on ADA design issues and using the content management system.
- **Web Developers:** Located throughout the campus departments, these individuals make regular changes to content as specified by the content owners. Redesigns/Retrofits websites according to recommendations from the compliance consultant and/or monitoring/verifying reports.
- **Content Owners:** Responsible for the content that is displayed on their department or project website. They may or may not be authoring on the content, but they are certainly responsible for its compliance to ADA standards. This means responding to reported ADA issues and possibly providing alternative means to access information during retrofitting.

XII. Milestones and Timelines

(Completed items are checked)

- ✓ **July 15, 2007:** Begin communication with Content Owners regarding retrofitting the sites identified in the First Year Report.
- ✓ **September 1, 2007:** Compile a list of administrative websites (all non-instructional) and respective content owners.
- ✓ **September 1, 2007:** New and updated websites, web applications, and web content shall conform to baseline accessibility standards as defined in Section 508, Subpart B (and possibly Subpart C).
- ✓ **September 30, 2007:** Modeling of accessible design for multiple disabilities (coloring, mobility, low/no-vision, etc.) on the campus accessibility website.
- ✓ **September 30, 2007:** Share the Web Accessibility Implementation Plan and updated accessibility website with the campus community.
- ✓ **November 1, 2007:** Complete the process of remediation for the sites identified in the First Year Report.

- ✓ **January 15, 2008:** Generate a report on the baseline state of all campus administrative websites.
- ✓ **January 30, 2008:** Purchase a content management system.
- ✓ **April 30, 2008:** Begin campus-wide training for initial users of the content management system.
- ✓ **July 15, 2008:** Administer the first survey to the campus community to assess the effectiveness of available training, support, and resources.
- ✓ **April 30, 2009:** Complete campus-wide training for initial users of the content management system. The training will continue to be offered for employees taking on related web responsibilities.
- ✓ **May 15, 2009:** All mission critical sites will conform to at least the baseline accessibility standards. If they cannot be made accessible, plans for alternative access will be developed, documented, and communicated.
- **May 15, 2012:** All sites will fully conform to Section 508 or undue burden plans will be implemented.