2.4.1 Accessibility of Information and Communication Technology

**Last Revised:** New

**Policy:** Piedmont Community College (PCC) will communicate information to all individuals in a manner that enables them to achieve their academic and professional goals. To achieve its commitment to maintaining accessibility in a digital environment, the college has established an information and communication technology (ICT) accessibility program.

**Purpose/Definitions:**

1. **Accessible:** Refers to the concept that people with disabilities are able to access and use a product or system, including with the help of assistive technologies. For example, an “accessible” Web site may be designed so that the text can be enlarged by the user, rather than having a fixed font size, or may be designed so that it can be interpreted and “read out loud” by screen reader software used by blind or low-vision people.

2. **Information and Communication Technology:** means any electronic system or equipment, and content contained therein, used to create, convert, communicate, or duplicate data or information.

3. **Accessible Information Technology:** Information technology that has been designed, developed, or procured to be usable by, and therefore accessible to people with disabilities, including those who use assistive technologies.

4. **Assistive Technologies:** Adaptive, rehabilitative devices that promote greater independence for individuals with disabilities by changing how these individuals interact with technology. Examples include special input devices (e.g., head or foot mouse, puff-and-sip switches, speech recognition), screen-reading software, and screen magnifiers.

5. **IT Service Provider:** Includes any person that designs, builds, implements, supports, or provides an IT service to College employees, students, or affiliates, using a College IT resource. Examples of IT service providers include: website administrators, workstation support staff, server administrators, software programmers, application developers, data network technicians, user account administrators, and computer center personnel.

6. **VPAT:** A VPAT, or Voluntary Product Accessibility Template, is a self-assessment document completed by a vendor that provides relevant information on how their product or service claims to conform to Section 508 Standards.

7. **Reasonable Accommodation:** Reasonable accommodation means any change to the work or educational environment, or the way things are usually done, that allows an individual with a disability to apply for a job, perform job functions, participate in the academic environment, or enjoy equal access to programs, services or benefits available to individuals without disabilities. The college is not required to provide accommodations that impose an undue hardship on the institution.

PCC is committed to providing information and communication technology that is accessible to all, and in particular to individuals with disabilities. To this end, the College seeks to deploy ICT that has been designed, developed, or procured to be accessible to people with disabilities, including those who use assistive technologies.
Approval Authority/Monitoring Authority: Piedmont Community College’s Board of Trustees has approval authority for this policy. The President and Vice-President of Instruction and Student Development have monitoring authority for this policy.

Procedure:

The purpose of the ICT Program is to establish processes to address accessibility in a systematic fashion at each PCC Campus, using local structures and practices as appropriate. The President must designate an individual, and/or a committee to develop and oversee the Program and to promote coordination with systemwide ICT accessibility initiatives. Any designated individual and/or committee must represent a broad range of functional areas and be able to address academic, research, and administrative concerns and needs. Locations are encouraged to be innovative in addressing ICT accessibility. At a minimum, the Program must include the following:

1. Authority and Responsibility: Assignment of roles, authority, responsibilities, and accountability for achieving policy compliance.
2. Audience: A strategy to address the different needs of the academic and administrative functions and to support ICT accessibility for decentralized academic activities.
3. Prioritization: A process to prioritize effort that takes into consideration local needs, practices and available resources, including providing access to centralized IT accessibility support.
4. Design Process: A strategy to incorporate accessibility into the design and authoring process of electronic information resources.
5. Procurement: A procedure to incorporate ICT accessibility into the procurement process, including establishment of a formal means for evaluating the accessibility of products or systems under consideration for procurement.
6. Training: A training plan for personnel who develop and maintain electronic information resources, author web content, or make ICT related purchases.
7. Awareness Campaign: A communication plan and campaign to raise awareness about ICT accessibility.
8. Compliance Monitoring: Processes for monitoring compliance, including compliance with any standards listed in this document.
9. Evaluation: An evaluation process to measure the effectiveness of the Program.
10. Exception Process: A process for determining exceptions and for ensuring the development, documentation, and communication of effective alternate forms of access.
11. Office of Information Technology: Promote awareness of policy. Provide consulting services to units making changes in order to comply with this policy.
12. Purchasing Services: Establish procedures to assure that College specifications for technology purchases include specifications for accessibility when relevant.
13. College Departments: Indicate on purchasing requisitions that technology accessibility issues are relevant.
14. Web Development: Provide consulting services to departments making changes to accommodate this policy.
15. Distance Education: Provide accessibility training, consultation, and review online courses for adherence to accessibility requirements.
Standards

1. **Syllabus**: In order for students to have notice of their rights and responsibilities, faculty and instructors shall include a statement regarding reasonable accommodations in their course syllabus.

   **Standard Syllabus Statement**
   
   *If you have a disability or special need that may affect your academic performance and are seeking accommodations, it is your responsibility to inform the Disabilities Counselor as soon as possible. It is important to request reasonable accommodations early enough to give the Disabilities Services Office adequate time to consider your request and recommend reasonable accommodations. Instructors will provide necessary reasonable accommodations based on recommendations provided.*

   In the event that software or services are known not to be accessible are used in the course, faculty and instructors must also provide notice to students as part of the syllabus accessibility statement.

2. **Textbooks**: In keeping with best practices, faculty should give preference to textbooks from publishers who provide alternate format.

   Students with print-related disabilities can request their textbooks and instructional materials in an alternate format from Disability Services to ensure equal access. Production of alternate formats can be time-intensive, and while most files can be provided within two weeks, others can take as long as four months to procure for use.

   Alternate formats of materials for students should be provided at the same time that the student at large is able to access the material through regular means. Providing textbooks and supplemental reading material list at the time of registration ensures that students have adequate time to partner with Disability Services to ensure materials are completed prior to the first course meeting.

3. **Closed-Captioning and Audio Description of Audio-Visual Materials**: Individuals with hearing impairments may require closed-captioning in order to access the audio component of video media, and individuals with visual impairments may require audio description in order to access video content. Reasonable accommodations for closed-captioning and audio description for students, faculty, and staff must be provided at the same time that the multimedia is shown to the class or audience. Any video media material that is used for participation in a course must be captioned and/or described. If an instructor or presenter is aware of a reasonable accommodation request at least five days in advance, closed-captioning or audio-describing is required. If providing the captioned or audio-described version at the same time is problematic, the video media shall not be used and alternate accessible materials may be substituted.

   Required closed-captioning or audio-describing must ensure accuracy (spell all words correctly), synchronicity (ensure that the captions do not lag behind or race ahead of the dialogue), completeness (making sure everything gets captioned and that captions do not use shorthand), and placement (at a minimum, captions do not obscure visual information).
Departments have a responsibility to ensure closed-captioning is available on materials related to their program and/or service for which access is unrestricted (e.g., video content available to the general public).

All departments, programs, faculty, instructors, and employees are encouraged to purchase on captioned versions of audio-visual media whenever possible. Audio-described versions of audio-visual media are also recommended for purchase. In general, any non-transcribed audio and any non-captioned, non-described video that is in current use should be updated.

4. **Digital Signs**: The use of digital signs across campus afford the opportunity to push dynamic content to specific audiences. Digital signs for use in any public program, service, or activity must be made accessible, for example, by replication of information in an accessible medium.

5. **Procuring Goods and Services**: Any ICT good or service procured for use in a PCC program, service, or activity must be reviewed and made accessible to the extent feasible in compliance with the following:
   a. Department deans, directors, or their designees are responsible for ensuring that request for proposals, contracts, or other service arrangements for the acquisition of digital technology include requirements to adhere to Web Content Accessibility Guidelines (WCAG) 2.0 AA Success Criteria, www.w3.org/TR/WCAG20. For digital technology services which are widely used by the college, the IT service provider must ensure that accessibility is independently validated rather than solely relying on vendor assertions. This is especially critical for enterprise-level systems or technologies that affect a large number of students, faculty, and/or staff.
   b. When making ICT purchases or renewals the Purchase Requestor or the Department Buyer must ensure a compliant Voluntary Product Accessibility Template (VPAT) or an acceptable alternative must accompany the P-Card or Requisition before the purchase can be paid/made. The only time the PCC Purchasing Department will obtain the VPAT is when conducting a formal bid. Only vendors with a compliant VPAT (or acceptable alternative) will be evaluated and awarded the bid.
   c. Instructional materials should be available in multiple formats (e.g., print, electronic, audio) if possible. Given two (2) or more equivalent instructional materials, the instructor should select the version with the highest levels of accessibility. Ancillary materials (software, tutorials, recordings, videos, labs, and other educational tools) ordered for a course should meet all current requirements for accessibility. A compliant Voluntary Product Accessibility Template (VPAT) or an acceptable alternative must be obtained from the vendor.
   d. The information provided by vendors must be valid, measured using a method that is reliable and objective. Those making procurement decision must be able to objectively evaluate the accessibility of products, and to scrutinize the information provided by vendors.
   e. VPATs will be kept on file at the College for the duration of the product’s or service’s life cycle.
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f. As part of the evaluation there will be criteria checklist that will be reviewed to ensure accessibility is met. The ICT Program committee will be responsible for maintaining and publishing an evaluation checklist.

6. **Other Digital Content:** Departments have a responsibility to ensure communications intended for large audiences (for example, emails, promotional materials, maps, and materials in pdf FORMAT) related to their program and/or service are accessible. Official content that represents the college and is available to the general public must be accessible. College staff and faculty can receive assistance in addressing accessibility for digital content from Distance Education staff.

**Program evaluation process:**

1. Web Standard Electronic information must meet the Web Content Accessibility Guidelines (WCAG) 2.0 at level AA Success Criteria. More information about the World Wide Web Consortium’s (W3C) standards for accessibility can be found at the W3C website.

2. New development and purchases, including development and purchases for major revisions and updates of existing electronic information resources, must receive higher priority over the retrofit of existing electronic information resources.

Additional standards for other electronic information resources may be identified over time and added to this Requirements document.

**Exceptions:** Conformance to standards may not always be feasible due to the nature of the content, the purpose of the resource, the lack of accessible solutions, or an unreasonably high administrative or financial cost necessary to make the resource accessible. However, these difficulties do not relieve College programs or services from their ICT accessibility obligations. College managers of programs and services must be prepared to provide content and/or services in a suitable alternative format (e.g., electronic text file or audio description) upon request.

**Legal Citation:** The policy supports the following local, state or federal guideline/laws: American with Disabilities Act of 1990; Section 504 and 508 of the Rehabilitation Act of 1973; Web Content Accessibility Guidelines (WACG) 2.0 AA

**History Note:** Effective October 18, 2016