WEB AND MEDIA ACCESSIBILITY COMMITTEE REPORT

November 2014
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Overview

In recognition of its obligations under federal and state law, Ferris State University has established policies prohibiting unlawful discrimination in its provision of educational programs, employment, housing, public services, and public accommodations. The Board of Trustees’ Policy on Non-Discrimination “express[es] the University’s intent and commitment to comply with the requirements of state and federal non-discrimination laws.” Among the statutory references of the Policy on Non-Discrimination, the University expressly includes state and federal legislation prohibiting disability discrimination, including the Americans with Disabilities Act and the Rehabilitation Act of 1973.

Federal enforcement of legal prohibitions of disability discrimination is conducted by the Department of Justice (DOJ) and the Department of Education, Office for Civil Rights (OCR). Despite the fact that DOJ announced in 2010 its intention to propose regulations for electronic and information technology accessibility, regulations have not been proposed and little case law exists as guidance for institutional compliance with requirements for Web, media, and other electronic information technology accessibility. Compliance reviews of institutions and employers covered by federal law demonstrate that enforcement agencies have taken the position that covered entities have a proactive obligation to ensure accessibility of electronic and information technologies.

To address the University’s responsibility for ensuring compliance with these federal requirements and in response to a February 20, 2013 memo from a subgroup of the Liaison Committee for Students with Disabilities regarding accessibility issues on campus, Ferris President David Eisler established a Web and Media Accessibility Committee, championed by former Vice President for Extended and International Operations Don Green and Vice President for University Advancement and Marketing Shelly Armstrong. Co-chaired by Deb Cox, Department Head of Educational Counseling and Disabilities Services, and Jody Gardei, Manager of Staff Training and Development, the committee included representation from across the University and was organized into the four sub-committees of communication; information technology; policy, procedure and strategy; and instruction, faculty, training and equipment (Appendix 1).

Areas of Primary Focus

With most core communication moving online, Web accessibility for people with physical, visual, hearing, and cognitive/neurological disabilities has become critical to achieving inclusivity goals. Ideally a website should be available to the widest possible audience, but unfortunately many fundamental steps of Web accessibility are overlooked through lack of knowledge or compromise on design. Common accessibility problems that need to be addressed in websites include images and links without alternative text, untranscribed audio or uncaptioned video, lack of alternative information for users who cannot access frames or scripts, forms without a logical tab sequence, tables that are difficult to decipher when linearized, or poor color contrast.
Ferris’ current practice is to provide both visually and hearing impaired students with appropriate accommodations when requested. Deb Cox said the Office of Educational Counseling and Disabilities Services provides a moderate level of accessible services for students with disabilities, but many students will want/need and sometimes demand a greater level of accessibility than what the office can provide. Of the seven different categorical types of disabilities, those students identified with Acquired Brain Injury/Traumatic Brain Injury (ABI/TBI) and Physical, Sensory and Mobility (PSM) disabilities are most likely to have special technology needs that require specialized equipment and an instructional technologist, which Disabilities Services does not have. From Summer 2013-Spring 2014 there were a total of 5 ABI/TBI and 52 PSM students who required special accommodations.

During the course of the committee’s work, which spanned over the 2013-2014 academic year, a number of proactive steps were taken to educate the Ferris State University community about Web and Media Accessibility. For example, during Spring and Summer 2014, 18 workshops and webinars on accessibility were conducted by the offices of Technical Education and Outreach, Faculty Center for Teaching and Learning and Disabilities Services. Eighty-one participants attended sessions covering the topics of what accessibility is and why does it matter; creating accessible websites, and Word and PDF files; and creating closed captioning for audio and video. Four individuals attended the AHEAD Accessing Higher Ground conference to be trained. An assistive technology add-on to the online video tutorials repertoire with Atomic Learning was purchased. Educational Counseling and Disabilities Services paid for captioning of video materials for classroom or training materials if informed or requested.

Besides training, the committee focused its attention on discussing the accessibility of Web-based information and technology that students, faculty, and prospective students must use in order to enroll in the University, complete course requirements, and make progress towards a degree. This includes student information systems, learning management systems, Web-based teaching, evaluation, and communication systems used in the classroom, and college, school and departmental websites.

Additionally, the committee addressed the accessibility of Web information and technology that students, faculty, and staff use to effectively participate in programs, services, and activities offered by the University such as Web technology used for athletics, housing and residential life, student financial services, student activities and support services, human resources, general financial services and departmental websites.

Considerable discussion ensued about the need to caption and/or transcribe publicly available official multimedia content that represents the University’s mission (such as video and/or audio used for marketing, news, athletics, online or face-to-face classroom instruction, etc.). This would pertain to any pre-recorded or live multimedia content available on ferris.edu or externally hosted Ferris sites.

The official Ferris State University website (ferris.edu) has subscribed to the Usablenet Assistive service to quickly and effectively improve Web accessibility and compliance. The assistive view of the Ferris website is a text-only version of its official website that delivers content and services to people with compromised sensory abilities. As a point of concern, kcad.edu does not
have a built in accessibility compliance check, a text only version of the website, or a staff member to oversee website accessibility compliance.

In addition, Ferris creates and updates content for its website through the OmniUpdate content management system. OmniUpdate has an accessibility feature that checks all content for accessibility compliance before it can be published.

Assistive Technology compliance and efforts have primarily focused on the ferris.edu and kcad.edu websites and further action will be needed for online course materials, administrative and financial software systems, student portal and third-party hosted Ferris sites. Some examples of other materials that should be accessible are McGraw-Hill textbook integration, Respondus Lock-Down Browser, Tegrity, AdobeConnect, Banner, AtomicLearning, Lynda, Blackboard, MyFSU, MyDegree and Kronos.

Efforts have been made to modify the Admissions Application and areas of Self-Service Banner for accessibility.

The committee established first- and second-tier priorities (Appendix 2) for achieving accessible systems, forms, documents and videos, keeping the key components of recent legal settlements that follow in mind when targeting the elimination of accessibility across the university.

**Recent Legal Settlements**

Accessibility barriers to curricular content and courses are frequently cited in investigations by the U.S. Department of Education’s Office for Civil Rights and in case law. For example, in August 2012, the student disability group at University of Montana filed an OCR complaint alleging numerous accessibility problems with the online course management system and instructional content including:

- Inaccessible live chat and discussion boards in the learning management system
- Inaccessible faculty-prepared class assignments and materials posted online
- Inaccessible scanned documents
- Uncaptioned videos
- Inaccessible library database materials
- Inaccessible course registration through the campus portal
- Inaccessible classroom clickers

In May 2013, the University of California--Berkeley and Disability Rights Advocates—a legal advocacy firm—reached a broad-based settlement regarding accessibility barriers to print materials. UCB agreed to make significant changes to business procedures in order to ensure that students with print disabilities are provided comparable and timely access to print materials used in courses and offered at campus libraries. Some of the key outcomes of this agreement include:

- Shorter timelines for delivering print materials in alternate format (e.g., Braille, audio, eText)
- Providing “interim services” (e.g. personal readers, extensions of course deadlines) while students are waiting for delivery of alternate format materials
- Providing students an online system to track the status of their alternate media requests
Remediating the online library catalog software for compatibility with assistive technology used by persons with disabilities
Developing a library print conversion system to convert library materials into alternate formats

Survey of Peer Institutions

An important component of the committee’s work was to determine how to best approach Ferris’ accessibility needs based on successful practices of peer institutions. An electronic disability accessibility survey was developed and served as the primary means for informing the committee about what other Michigan universities are doing to ensure accessibility of web-based systems, web content and websites.

Survey questions pertained to whether they have web and media accessibility policies and guidelines; procedures and processes for maintaining accessibility; offer services for captioning and transcribing videos; utilize assistive technology for electronic documents such as screen reader software; and offer structured accessibility training and professional development.

The survey was distributed to provosts at the 15 Michigan public universities during Spring 2014, with 11 universities completing the survey. Participating universities were Central Michigan University, Eastern Michigan University, Ferris State University, Grand Valley State University, Michigan State University, Michigan Technological University, Northern Michigan University, The University of Michigan, The University of Michigan at Dearborn, Wayne State University, and Western Michigan University.

Since the survey sample was small, there are few solid conclusions. However, the data collected was helpful in informing the committee about how Michigan peer institutions are addressing accessibility issues. Highlights are as follows:

- A majority of the institutions that responded use third party closed captioning services either as the sole resource or to supplement their institutional needs.

As descriptive captioning or more sophisticated systems are developed, universities will need to continuously assess the operational and financial investments made for achieving compliance in this area.

- The majority of the respondents do not have accessibility policies.

Further consultation with Ferris’ General Counsel’s Office is strongly encouraged to determine whether additional policies and guidelines for achieving accessibility compliance with federal and state laws are necessary.

- Establishing an office or individual who is assigned to reviewing the accessibility of online material is a prevalent method of assuring compliance with half of the reporting institutions noting that they have individuals reviewing the accessibility of online materials.
Many respondents cited the need for collaboration by many offices to achieve and maintain accessibility.

This multifaceted approach is beneficial as new software and technology improvements allow for greater access to use university resources.

- When determining if an outside consultant was needed, universities have approached this question by asking internal teams about their need to learn more about accessibility. There are professional development opportunities for different levels of expertise.

- Many institutions have created and maintained campus-wide accessibility committees to assist all stakeholders with compliance requirements.

See Appendix 3 for an executive summary of the Disability Survey.

**Key Recommendations for Success**

The task force outlined the following recommendations that focus on University efforts to continuously improve and institutionalize its business and academic processes in order to deliver accessible technology to all students, staff, faculty, and the general public regardless of the disability.

1. Clarify what office/unit is accountable for compliance with accessibility standards and has the authority to delegate responsibilities to other University offices to ensure accessibility compliance with applicable federal and state laws.

2. Determine whether incremental improvements in removing accessibility barriers is sufficient or whether more stringent standards such as the committee’s recommendation to adopt WC3’s Web Content Accessibility Guidelines 2.0 Level AA (priority levels range from A – minimum standard to AAA – highest standard) is feasible.

3. Hire a Web and Media Accessibility consulting firm to complete an audit to help determine next steps. An audit would help the committee revise and/or act upon its recommendations to:
   a. Develop a Web and Media Accessibility Policy and Guidelines for the University outlining accessibility standards and expectations for website and Web-based content, including all electronic documents and multimedia distributed through the official Ferris website (ferris.edu and kcad.edu) or externally hosted Ferris sites and for the procurement of hardware and software and systems.
   b. Determine what areas of the website are the highest priorities for accessibility.
c. Hire or designate a staff member with responsibility and commensurate authority to coordinate the University’s electronic and information accessibility policy, procedures and initiatives.

d. Provide staff support and funding for captioning and transcribing all multimedia (audio and video) for instructional, informational or promotional purposes (including videos posted on YouTube).

e. Hire a qualified adaptive/assistive technologist reporting to Information Technology who can assist the university with technology and software accessibility issues. This individual would assist Educational Counseling and Disabilities Services, Human Resources, FLITE, FCTL, and any office at the University needing technical support for accessibility.

f. Pursue additional personnel or professional development funding, as needed, to support the need for training and one-on-one support especially for course management tools.

g. Provide support to bring the current kcad.edu website up to WCAG 2.0 standards or support a request for a new kcad.edu website with a vendor experienced in WCAG 2.0 compliance.

4. Create and foster a culture of universal design accessibility across the University and position accessibility of University programs and services as everyone’s responsibility and not just that of Disabilities Services.

5. Develop a comprehensive website on accessibility that serves as a central resource for members of the University community.

6. Implement a program to provide ongoing education, training and support to members of the University community.

7. Address first- and second-tier priorities (Appendix 2) identified by the committee for achieving accessible systems, forms, documents and video as resources allow.

8. Focus special efforts on ensuring the accessibility of Ferris’ library services and the library website, including library database materials and labs. Also includes continuing to update the Assistive Technology lab located in FLITE 119 with new technology and the latest software.
Appendix 1

Media and Web Accessibility Committee
Jody Gardei and Deb Cox, Co-Chairs

University Representation

Academic Affairs – Deb Cox, Steve Cox, Kim Dickman, Jackie Hughes, Marie Yowitz, Ann Breitenwischer, Franklin Hughes, Glen Okonoski, Tom Behler

Administration and Finance – Vicky Deur, Jody Gardei, Mary Holmes, Joe Strohkirch, Bob Griffith, Sharon Hopper, Dominic Henning, Terry Aldrich

External and International Operations - Don Green, Deb Thalner

General Council – Matt Olovson

Kendall – Darcy Storms

Student Affairs – Kristen Salomonson

University Marketing and Advancement – Shelly Armstrong, Ted Halm

Teams

Communication – Shelly (Chair), Ted, Sharon, Kristen, Steve, Bob, Franklin, Glen, Dominic, Terry

Information Technology – Mary (Chair) Vicky, Jody

Policy, Procedure, & Strategy – Deb C. and Jody (Co-Chairs) Don, Matt

Instruction, Faculty Training, & Equipment – Jackie (Chair), Kim, Marie, Deb T., Darcy, Ann, Joe, Tom
February 12, 2014 Meeting Breakout Results on Priorities

*First priorities* of focus for systems requiring accessibility on the Web are:

- Library systems
- Student housing application (Sales Force)
- MyHousing
- MyFSU
- Banner Self-Serve
- Gmail for students
- FerrisConnect
- Admissions application
- Videos posted to YouTube, videos in Tegrity, and video lecture captioning software used in conjunction with FerrisConnect
- External websites hosting content for teaching purposes

*Second priorities* for systems requiring accessibility on the Web are:

- Banner INB
- WebFocus reporting tool
- Office 365
- Password management tool
- Student employment
- PeopleAdmin
- Physical Plant work order system
Appendix 3

Ferris State University

Disability Electronic Accessibility Survey Results – Narrative

Report completed by Web and Media Accessibility Committee

July 28, 2014

Executive Summary

Ferris State University created the Disability Electronic Accessibility survey to determine how other Michigan universities have developed plans for and implemented web and media accessibility standards; governed procedures and systems maintaining accessibility; and structured professional development opportunities in this area. The 15 universities surveyed were asked questions related to their implementation processes and procedures for accessibility, including the provision of visual media captioning and electronic document creation accessible to assistive technology, such as screen reader software.

The purpose of this survey is to raise awareness about the current state of web and media accessibility in Michigan public universities. This data will assist Ferris State University and others to determine how to approach university accessibility needs based on successful practices of peer institutions.

The survey was distributed to provosts at the 15 Michigan public universities during the spring of 2014. Survey creators designed the survey using the Questions Pro program. A total of 11 universities returned the survey by July 25, 2014. The participating schools are: Central Michigan University, Eastern Michigan University, Ferris State University, Grand Valley State University, Michigan State University, Michigan Technological University, Northern Michigan University, The University of Michigan, The University of Michigan at Dearborn, Wayne State University, and Western Michigan University.

Survey Results

1. What is the total student population of your school?

   35,001 and up (3)
   20,001 to 35,000 (4)
   10,001 – 20,000 (1)
   3,001 – 10,000 (3)

2. Does your university have a closed caption service or process on site, do you use a third party provider, or do you use both on site and off site providers?

   Third party providers (5)
   On site (1)
   Both are used (2)
   Neither service is used (3)

   7 out of 11 responders use third party providers exclusively or use them in conjunction with university captioning services.
3. If you caption materials on site, what is the name of the office that completes this service?

**Western Michigan University**  
Disability Student services and Extended University Programs

**University of Michigan**  
Services for Students with Disabilities

**Michigan State University**  
Resource Center for Persons with Disabilities; IT Services  
Teaching and Learning (Learning Design and Technology)

**Eastern Michigan University**  
Automatic Sync Technologies, LLC  
Captioning: $69.00/hr.  
Transcription: $90.00/hr.  
Rush transcription: $120>00

4. If you use a third party provider, what is the name of the company you use? What is the fee for this service?

**Ferris State University**  
3Play Media  
Varies depending on the urgency of the request  
Caption Sync  
Varies depending on the urgency of the request and the service you are requesting. Transcripts can be provided in lieu of captioning.

**Michigan Technological University**  
ACS  
About $150/hour

**University of Michigan**  
Automatic Sync Technologies/CaptionSync  
$70/hour to time code transcripts

**Michigan State University**  
CaptionSync (published rates). See also:  
http://webaccess.msu.edu/resources/captioning-services.html  
See also: https://www.rcpd.msu.edu/programs/signlanguage

**Grand Valley State University**  
Doc.Soft, Automatic Sync Technologies. Fees vary, but average is 2.85 per video minute

**Central Michigan University**  
Screen Line Productions - sliding fee schedule depending on time of captioning and difficulty/technical nature of the material.

5. How many total individuals are employed to manage your close captioning process?

The results indicate that 5 of the 11 respondents do not have individuals employed to work specifically with captioning.

6. Of the total, how many of these employees are students?

Only 2 institutions utilized student workers for captioning.

7. What is the approximate total budget for the office including employee salaries and benefits?

The responses to this question do not provide a clear picture of the cost of captioning. The question was poorly written.
8. Please describe the processes faculty and staff use to caption digital media materials. e.g., Do academic departments use one system for captioning materials?

Answers varied on the processes for faculty and staff use to caption materials. There are captioning standards for e-learning systems. Several comments from this question and earlier questions indicate processes in place for lecture capture systems and third party providers.

9. Do you caption media from athletic, art, social, and other events held on and off-campus?

It appears that almost half the respondents do caption media from athletic, art, social, and other events.

10. Do you caption digital media for online courses, face-to-face courses, or both?

Digital media is captioned for both face-to-face and online courses for 6 of 8 responders.

11. Do you provide or are you considering providing descriptive captioning for videos?

Only one institution already provides descriptive captioning for videos and a second uses an alternative method. Five schools are currently considering using descriptive captioning for videos.

12. Do you have a university technology accessibility policy?

8 of 11 responders do not have a university technology accessibility policy.

13. If you have accessibility policies, please provide the name of the policies.

1 of three universities who have a policy shared their policy link.

14. If you have specific policies, how do you enforce these standards?

Policies or enforcement of accessibility standards is handled by two different departments/divisions at the two universities responding.

15. Do you have an individual at your school who works specifically with reviewing the accessibility of online materials?

Six of 11 respondents have an individual who works specifically with reviewing the accessibility of online materials.

16. Is there an approval process to ensure accessibility of on-line materials in place?

Eight of the eleven respondents do not have an approval process to ensure accessibility of online materials.
17. Please share your approval process for ensuring on-line materials are accessible:

Of the three responders, two responders have different departments that ensure the review of all online accessible materials.

18. What office oversees this function and are there sanctions for not meeting the standards?

Of the three responses the respondents cited different offices that would work with faculty and staff to ensure materials are accessible.

19. Do you have a specific office/individual that is in charge of Section 508 and Americans with Disabilities Act Amended Act?

8 of the 11 responders have a specific office/individual in charge of Section 508 and the American with Disabilities Act Amended Act.

20. What are the specific offices that are involved with professional development/training for faculty, staff, IT and other individuals?

Most universities provide opportunities for development and training including: Teaching and learning centers (5), Disability Service offices (5), Human Resources (4) equal opportunity (2), IT Technical Education (2), and Online Programs (1).

21. Is there a budget for professional development/training for each division at your university?

7 of the 10 responding schools do not have a budget for professional development/training.

22. Please provide details about available professional development/training:

Only one institution responded.

23. Have you hired a consultant to assist with accessibility training?

9 out of 11 institutions have not hired a consultant.

24. What specific topics were addressed by the consultant? Please list the name of the consultant.

Only one institution responded.

25. Do you have an assistive technologist on staff?

6 of the 11 schools have an assistive technologist on staff.
26. Please list the assistive technologist’s responsibilities at your institution:

See specific survey detail for specific remarks from 5 respondents.

27. Did you use an accessibility consultant?

1 of 11 schools hired an accessibility consultant.

28. Would you recommend hiring an accessibility consultant?

Responses to this question were not conclusive.

29. Other suggestions or recommendations:

See survey detail.

Conclusions

Since this survey sample is small, there are few solid conclusions to be discussed.

A majority of the institutions answering this survey use third party closed captioning services either as the sole resource or to supplement the institutional need. As description captioning or more sophisticated systems are developed, universities will need to continuously assess the operational and financial investments made for achieving compliance in this area.

The majority of the respondents do not have accessibility policies. Consultation with the General Counsel’s Office may be appropriate action in determining whether additional policy is necessary at Ferris.

It is interesting that half the reporting institutions have individuals reviewing the accessibility of online materials. Having an office or individual assigned to the accessibility of online material is prevalent method of assuring compliance.

Many respondents cited the need for collaboration by many offices to achieve and maintain accessibility. This multifaceted approach is beneficial as new software and technology improvements allow for greater access to use university resources.

When determining if an outside consultant was needed, universities have approached this question by asking internal teams about their need to learn more about accessibility. There are professional development opportunities for different levels of expertise. Many institutions have created and maintained campus-wide accessibility committees to assist all stakeholders with compliance requirements.