

# DIGITAL ACCESSIBILITY

## 295 Policy

### Policy Statement

Glen Oaks Community College will promote and monitor the accessibility of its electronic and information technology ("EIT"), which includes third-party sites with whom GOCC contracts or links and any GOCC acquisition of online content provided or developed by third parties that the college chooses to make available on the website. GOCC has adopted the W3C WAI's Web Content Accessibility Guidelines 2.1, Level AA conformance standard (in accordance with the American Disabilities Act and the Rehabilitation Act of 1973) to determine whether all web content is accessible.

Students, prospective students, employees, guests, and visitors can report violations of the technical standards used by GOCC, file a formal complaint through its Section 504 and Title II grievance procedure, and/or contact a Web Accessibility Coordinator with any concerns.

### Rationale

The Americans with Disabilities Act (ADA) and the 1998 amendment to the Rehabilitation Act of 1973 (Section 508) requires agencies and government supported organizations to provide individuals with disabilities access to information that is comparable to the access and experience available to others.

### Entities Affected by this Policy

This policy affects all of GOCC's faculty, staff, students, board members, contractors, and guests of the college.

### Who Should Read this Policy

All GOCC faculty, staff, students, board members, contractors, and guests.

### Related Documents

1. GOCC's Acceptable Internet Use Policy

<https://catalog.glenoaks.edu/college-policies-procedures/collegewide-policies-procedures/internet-technology-use-policies/acceptable-internet-use-policy/>

2. Public Law 105-220, "Section 508 of the Rehabilitation Act of 1973, as amended in the Workforce Reinvestment Act of 1998"

<https://www.govinfo.gov/content/pkg/PLAW-105publ220/html/PLAW-105publ220.htm>

3. Section 503 of the Rehabilitation Act of 1973, as amended

<https://www.dol.gov/agencies/ofccp/section-503/law> (<https://www.dol.gov/agencies/ofccp/section-503/law/>)

4. Web Content Accessibility Guidelines

<https://www.w3.org/TR/WCAG/>

5. Title 44, U.S.C., § 3501, "E-Government Act of 2002"

<http://www.gpo.gov/fdsys/pkg/PLAW-107publ347/pdf/PLAW-107publ347.pdf>

6. Title 36, Code of Federal Regulations (CFR), Part 1194, "Electronic and Information Technology (EIT) Accessibility Standards"

<https://www.ecfr.gov/current/title-36/chapter-XI/part-1194> (<https://www.ecfr.gov/current/title-36/chapter-XI/part-1194/>)

7. Title 48, CFR, 39.204, Federal Acquisition Regulations (FAR), "Acquisition of Information Technology"

<https://www.govinfo.gov/content/pkg/CFR-2002-title48-vol1/xml/CFR-2002-title48-vol1.xml#seqnum39.204> (<https://www.govinfo.gov/content/pkg/CFR-2002-title48-vol1/xml/CFR-2002-title48-vol1.xml#seqnum39204>)

8. Federal Acquisition Regulation, Final FAR Ruling 48, CFR Parts 2, 7, 10, 11, 12 and 39 (FAC 97-27; FAR Case 1999-607)

<https://www.ecfr.gov/current/title-4> (<https://www.ecfr.gov/current/title-48/>)8

9. Public Law 105-220, Workforce Investment Act of 1998, Amendment to Section 508 of the Rehabilitation Act (29 USC 794d)

<https://www.govinfo.gov/content/pkg/PLAW-105publ220/html/PLAW-105publ220.htm>

10. GOCC-specific policies and directives that relate to accessibility, equal opportunity, and reasonable accommodations

<https://catalog.glenoaks.edu/college-policies-procedures/>

### Contacts

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### Definitions

1. *Accessible*: refers to a site, facility, work environment, service, or program that is easy to approach, enter, operate, participate in, and/or use safely and with dignity by a person with a disability.
2. *Americans with Disabilities Act*: a comprehensive, federal civil rights law that prohibits discrimination based on disabilities in employment, state and local government programs and activities, public accommodations, transportation, and telecommunications.
3. *Compliance*: adherence to the web accessibility standards and practices detailed in the Web Content Accessibility Guidelines 2.1 WCAG Priority 2, AA web accessibility standards.
4. *Content owner*:
  - a. Any individual capable of accessing and posting content on any of GOCC's online content.
  - b. Any third party responsible for posting content on behalf of GOCC.
  - c. A web-based service contracted by GOCC that serves a GOCC business and the GOCC employees responsible for administering those sites.
5. *Disability*: with respect to an individual: a physical or mental impairment as defined by the ADA that substantially limits one or

more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.

6. *Electronic and Information Technology (EIT)*: EIT includes GOCC web content, including web pages, media and documents provided on all college websites and official social media platforms, as well as any linked information from 3rd party websites that are not maintained by the college; online learning content, including learning management systems, e-learning tools, and any electronically delivered media, communications and documents.

7. *Rehabilitation Act of 1973 (Section 508)*: prohibits disability discrimination by federal agencies, federal contractors, and other recipients of federal financial assistance. Types of prohibited discrimination include employment; education; building accessibility; and health, welfare, and social services.

8. *Remediation*: the process undertaken to retrofit, redesign, or remove the content from the website found to be out of compliance.

9. *Web Content*: Web Content is a sub-category of EIT that specifically addresses the text, images, multimedia, documents, and all information provided on all college websites both for public audiences and employee-only resources.

## Procedures

### Responsibility

ADA Web Compliance Officer or designee (hereinafter "Compliance Officer") shall be responsible for ensuring that information and services offered via GOCC's websites are compliant.

### Proactive Monitoring

The Web Compliance Officer will monitor the EIT in order to evaluate compliance with accessibility standards and practices according to the Americans Disability Act of 1990 and the Americans Disability Act Amendment Act of 2009, Section 503 of the Rehabilitation Act of 1973, Section 508 of the Rehabilitation Act 1998 and the W3C/WAI/WCAG AA web accessibility standards.

Monitoring tools can be run at any interval but no less than each quarter. The Web Compliance Officer will then send a web-based information check sheet stating the degree of compliance to the Vice- President of Academics. If non-compliant, remediation will apply.

Anyone posting content must review content to ensure it meets the accessibility standards prior to publication or notification of any substantial change in accessibility standards.

### Accountability

The Web Compliance Officer will regularly report, track, and evaluate the status of the EIT to ensure compliance with Priority 2, AA accessibility standards. The ADA Compliance Officer will review web content that is reported as non-compliant.

Where possible, the websites will have a link to report accessibility problems to the ADA Web Compliance Officer.

The Web Compliance Officer will notify the content owners of any instance of non-compliance. The content owner shall be responsible for remediation according to the guidelines and timelines established by the agreement with the ADA Web Compliance Officer. The Web Compliance Officer shall ensure that the remediation steps are taken within 30 days of discovery, or the Web Compliance Officer will remediate the issue directly.

Lack of remediation on the part of contracted services could lead to termination of contract services and/or a hold on payment.

The Web Compliance Officer will be responsible for maintaining a record of reported instances of non-compliance and their ultimate resolution.

The IT Department may initially provide assistance to departments concerning content development. The IT Department will coordinate faculty training for those departments regarding the development and publication of accessible content. In addition, the IT Department will also train staff and faculty content developers in-person or provide the ability to take online training.

### Remediation

The Web Compliance Officer shall ensure that the EIT that fails to comply with accessibility will receive remediation within 30 days of discovery.

When EIT cannot be made accessible within 30 days of discovery, the content owner will be responsible for providing alternative access to the information.

If not remediated within 30 days of discovery, the IT Department will bring the content into compliance and inform the Web Compliance Officer of the changes made. The Web Compliance Officer will follow up with the content owner(s) to ensure proper training is administered, so future issues of this nature do not occur.

If remediation is not possible, and alternative access is not an option, content will be published with information on available assistive services (Phone number, fax, email options).

### Retrofit Accessibility

Content owners shall provide alternative ways for persons with disabilities to obtain services and information during any period where a EIT is undergoing retrofit in order to comply with accessibility standards.

### Training

Content owners are required to maintain a working knowledge of accessibility standards. Glen Oaks Community College will provide mandated annual training for content owners who develop and maintain GOCC's EIT in order to ensure that those who post content understand accessibility standards. Annual training will be over the Policy and the content owner's roles and responsibilities to ensure that web design, documents, and multimedia content are accessible. The Web ADA Compliance Officer will facilitate training in-person, or the training may be completed online.

This replaces previous version of what was referred to: Policy 2.95 Web Accessibility Policy.

**Policy History:** Approved by Board of Trustees 12/8/22, 4/13/2023