

Web Accessibility Implementation Plan

Cal Poly Pomona
2007-06-21

Introduction

Cal Poly Pomona faces a number of challenges in achieving web accessibility:

1. Distributed responsibility for web pages
2. Web pages distributed across many servers
3. No clear procedures for removing old content
4. Web pages created with a variety of tools, to a variety of “standards”.

Offsetting this, accessibility was a focus even prior to the Accessible Technology Initiative

Pre-ATI Efforts

Cal Poly Pomona web templates

Following the redesign of the campus home page and other top-level web pages in the summer of 2003, there were numerous requests for templates, so that other administrative units could adopt the Cal Poly Pomona look and feel. Although the original design just barely met Sect. 508 standards, it was a typical 1990s design, heavy with nested layout tables and images. In August of 2004, the basic design was created from scratch in accessible semantic HTML and CSS, and the first templates were created. The templates have been continually assessed and improved, and Version 4.0 is now in development. Use of the Cal Poly Pomona templates has been an important factor in Sect. 508 compliance.

Accessibility training

The first workshop in web accessibility for which we have records was given in January, 2001, by the now-defunct Faculty Computing Support Center (its functions taken over by I&IT Learning). In the period prior to the Accessible Technology Initiative, web accessibility was commonly incorporated into training, but the lack of a mandate meant that many participants did not retain the training.

Web Policy

The newly proposed Web Policy, now under consideration by the Academic Senate, began as a draft set of web guidelines in the Web Guidance Subcommittee of the Information Technology Governance committee in January, 2005, right after Executive Order 926 was issued. It has had an accessibility requirement since the first draft.

Elements of the Plan

1. A process for auditing, monitoring and remediation of websites.

Institutional sites

Institutional sites will be monitored weekly with AccMonitor from Hiawatha Island Software. Reports will be made available on a public website, and monthly reports will be prepared using the workflow tool of the program. A process will be developed for sampled or rotating manual evaluations in addition to the automated monitoring. Email notices will be sent monthly to the site administrator (see below) of each site. It is the responsibility of the site administrator to

remediate any pages that are out of compliance within 20 business days of the report showing the problem. If remediation has not occurred by that time, I&IT Web Development will remove public web access from those pages.

Instructional sites

Instructional sites in the Blackboard learning management system, which is not available for public access, are not covered by this document.

Instructors are responsible for the accessibility of their public course web sites. To aid them in this,

1. An application will be provided that creates web sites using the Cal Poly Pomona web templates, designed for content to be entered using Adobe Contribute with accessibility enforced.
2. On-line tutorials are available that provide instruction in the basics of creating accessible web pages.
3. On-line training will be provided in the use of AccVerify from Hiawatha Island Software.

I&IT Web Development will keep a list of public course sites for both monitoring and informational purposes. Instructors will be encouraged to register their sites on this list, and to use stable URLs to keep the list current and useful. Any instructional sites that are discovered in the process of monitoring or other activities will be added to the list and evaluated (automated and manual) for compliance. Instructors are expected to evaluate their sites for compliance using AccVerify. Samples of instructional sites will be monitored with AccMonitor either weekly or monthly, depending on the volume of sites, and a subset of those will be evaluated manually. A program will be developed to randomly select instructional sites for evaluation. The owners of web pages that fail testing will be informed and given 20 business days to remediate the pages. If the pages have not been remediated at the end of that period, the non-compliant pages will have public read access removed.

Instructors are always allowed to use access controls to make instructional pages available only to the students in their classes. Such pages are treated as instructional materials, not as public web pages.

Personal sites

Individuals are responsible for the accessibility of their personal sites. To aid them in this,

1. An application will be provided that creates web sites using the Cal Poly Pomona web templates, designed for content to be entered using Adobe Contribute with accessibility enforced.
2. On-line tutorials are available that provide instruction in the basics of creating accessible web pages.
3. On-line training will be provided in the use of AccVerify from Hiawatha Island Software.

A program will be developed to randomly select sites for automated and manual evaluation. The owners of web pages that fail testing will be informed and given 20 business days to remediate the pages. If the pages have not been remediated at the end of that period, and if no waiver has been requested and granted, the non-compliant pages will have public read access removed.

2. A process for establishing accountability and documentation procedures.

According to the proposed new Web Policy, all institutional web sites are the responsibility of a site administrator who is an employee, all instructional web sites are the responsibility of one or more instructors, and all personal web sites are the responsibility of the person in whose web space they are located. These individuals will in every case be responsible for the accessibility of the pages. The auditing processes outlined above are provided to assist these individuals in meeting their responsibilities.

Documentation will consist of monthly reports on the accessibility of tracked institutional sites and sampled personal sites, and copies of correspondence between I&IT Web Development and the responsible individual necessary to achieve remediation or compliance of specific sites.

3. A strategy to ensure that new websites and web content incorporate accessibility in the design and authoring process.

1. All new sites are encouraged to use the Cal Poly Pomona web templates (<http://www.csupomona.edu/~webteam/depot.shtml>) or a content management system that uses these templates or equally accessible templates.
2. All organizations wishing to establish new identity management groups for the purpose of providing public web pages will be provided links to the templates and tutorials, and must agree that all web content on the site be accessible prior to the group and associated web space being created.
3. Individuals not trained in web design are strongly encouraged to make content updates to static web pages using Adobe Contribute or by some other method that enforces the provision of alternate text for images and other basic accessibility.
4. All content management systems should provide mechanisms to prevent or discourage the addition of inaccessible content.
5. All contracts for external web design must require Sect. 508 compliance as a minimum standard for all pages.
6. When the Cal Poly Pomona Intranet is replaced as the host of most campus web pages (prior to the May 15, 2009, milestone), only those institutional pages that pass an automatic check for Sect. 508 compliance will be moved. If technical challenges permit, this requirement will also be extended to instructional and personal sites.

4. A process for determining exceptions and for developing, documenting and communicating the equally effective alternate form of access that will be provided.

The techniques for making most web pages accessible are well-established. And, with the exception of many institutional sites and some personal sites (e.g., research groups), there is no business need for university web pages to be publicly viewable (in contrast to being available only to selected audiences through login). Therefore, requests for exceptions will be granted only under very specific circumstances:

1. After consultation and analysis, I&IT Web Development will either provide a method to make the page or site accessible (and perhaps specify an extended timeline for

- remediation), or determine that no remediation or alternate access can be provided. At this point, either the page in question shall be removed from public access, or an exception may be requested.
2. Exceptions are requested of the Vice President of I&IT, who will grant them, provided that
 - a. I&IT Web Development has determined that the page or site in question cannot be reasonably remediated nor can alternate access be reasonably provided.
 - b. Public access to the page or site serves the needs of the university in a clear manner that offsets the lack of accessibility

Because technology continues to advance, exceptions must be renewed yearly, upon the presentation of evidence that accessibility still cannot be reasonably achieved through current technology, and that the page or site still serves the needs of the university.

5. A process for identifying critical administrative websites that require remediation.

Critical web sites are not necessarily those that are most visited. As a general rule, a critical web site or page is one that its administrator would restore to functionality as soon as possible should it break. As part of the process of migrating institutional pages from the Cal Poly Pomona Intranet, administrative units will be expected to eliminate out-of-date and unneeded pages, and concentrate on the roles of the remaining pages in their business processes. A deliverable from this analysis will be the remediation of all remaining pages. This process will be completed before the May 15, 2009 deadline.

6. A process for providing alternative ways of delivering information during any period in which websites are undergoing retrofit.

The only circumstances in which this would be an issue are

1. A non-compliant web site for which a request for access has been received from an individual who is unable to access its features because of its non-compliance.
2. A web site that was made compliant to meet a milestone of this program, and then subsequently became so massively non-compliant that remediation could not be accomplished in a timely manner.

In either case, contact information will be provided for the individual responsible for the information on the web site, who will make the information available in an acceptable alternate form.

7. A training plan for those who develop and maintain websites and who author web content.

A number of avenues for training are already available

1. Workshops in basic web accessibility, offered by Organizational Development and Training and taught by personnel from I&IT Web development.
2. Workshops in the use of the Cal Poly Pomona web templates, offered by I&IT Web Development to site administrators of institutional sites.

3. Workshops in the use of Adobe Contribute, offered by I&IT Web Development to content providers of institutional sites.
4. Online tutorials:
 - a. Web Accessibility
(<http://www.csupomona.edu/~ehelp/web/accessibility/index.html>)
 - b. Use of the Cal Poly Pomona web templates
(<http://www.csupomona.edu/~ehelp/web/templates/index.html>)
 - c. Using Adobe Contribute
(<http://www.csupomona.edu/~ehelp/web/contribute/index.html>)

Online training will be added for:

1. Interpreting AccMonitor reports
2. Using AccVerify/AccRepair
3. Manual evaluation of web pages

If there is demand, workshops will also be offered for the latter two topics. General training in the use of Dreamweaver to create web sites has been deprecated, since without specific attention to web accessibility and university standards, it encourages employees to make non-compliant web pages.

8. A communication plan to educate the campus about web accessibility requirements.

The communication plan already has a number of functioning and ongoing components:

1. A campus-wide accessibility web site (<http://www.csupomona.edu/~accessibility/>).
2. Presentations to the Academic Senate.
3. Presentations in symposia and colloquia presented by the Faculty Center for Professional Development.
4. Inclusion of accessibility considerations in all assistance with web design provided by I&IT Learning and I&IT Web Development.
5. Frequent mention by the President in emails and captioned video addresses.
6. Articles in Polycentric, the Cal Poly Pomona online news provider.

Additional communication will take place in conjunction with the roll-out of public AccMonitor reports in Summer 2007 and the migration of web pages from the Cal Poly Pomona Intranet planned for mid-2008.

9. An evaluation process to measure the effectiveness of the plan.

The ultimate measures of the effectiveness of the plan are:

1. The percent of pages that pass accessibility testing (the expectation is that this would show an increasing trend, even if the figures for a given month were lower)
2. Meeting the milestones

In the event that one or both of these goals are not met, further analysis will include evaluation of the communication plan, to make sure target audiences are being reached, and specific technical or business process evaluations of the areas that are not meeting goals.

10. The identification of roles and responsibilities associated with the above processes.

Overall coordination is the role of I&IT Web Development, and its Director, who is the lead for the web accessibility component of ATI and who reports to the Vice President of I&IT, who is the Executive Sponsor of ATI at Cal Poly Pomona.

I&IT Web Development is also responsible for monitoring and documentation of compliance. If enforcement of compliance is necessary, the Director of I&IT Web Development will make recommendations to the Vice President of I&IT or the Director of Diversity and Compliance, as appropriate.

Training is the joint responsibility of I&IT Web Development, I&IT Learning, the Faculty Center for Professional Development, Organizational Development and Training, and the Disability Resource Center. Online training through eHelp also involves I&IT Support.

Communication is coordinated by the Office of Public Affairs and I&IT Support, and involves I&IT Web Development, I&IT Learning, the Faculty Center for Professional Development, Organizational Development and Training, and the Disability Resource Center.

Each individual who is responsible for a web site is ultimately responsible for the accessibility of that site.

11. Milestones and timelines that conform to the dates listed below.

2007-06-15	Deliver the Web Accessibility Implementation Plan to the Office of the Chancellor
2007-09-01	Provide and publicize AccMonitor reports of institutional web pages
2007-09-01	Provide eHelp tutorials in the use of AccVerify and publicize availability of the program
2007-09-01	Implement requirement to meet accessibility guidelines as a condition for granting new group web space