

Accessible Technology Initiative Committee
The University of Tennessee at Chattanooga
Annual Report 2016

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Background

The Accessible Technology Initiative was developed in 2013 to ensure that information technology resources and services are accessible to all students, faculty and staff at the University of Tennessee at Chattanooga. “Accessible” means that information, materials, and technologies are available to an individual with a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use.

The Chancellor’s Executive Team approved the Accessible Technology Initiative (ATI) in February 2014 (Appendix A). In July 2014, Chancellor Angle appointed an ATI Oversight Committee charged with guiding the implementation of the initiative. Membership includes faculty from each college and relevant staff members. Faculty members with a heightened interest in accessibility were also recruited.

The committee began its work in August 2014 and has held regular meetings each year, with subcommittees meeting separately and providing reports to the large group as needed. The UTC slogan for this initiative is “Everyone Achieves,” which is aligned with the University slogan and with the movement from a *culture of individual accommodation* to an *environment of accessibility*.

Activities, 2015-2016

Three subcommittees completed work in this academic year, and the activities are described below.

Administrative (Chair: Stuart Benkert, Academic Affairs)

Monitor the progress of policy and procedure development at the system level, scan campus for existing policies in different areas, create traction toward campus policy adoption.

The majority of the year was spent tracking legislative issues across the country (most were posted on UTC Learn (UTC’s Learning Management System as information items) and examining new UT System Policy which is contained below in summary.

This section describes the minimum requirements for UT locations to comply with UT IT0126 – Information, Materials & Technology Accessibility (IMT; http://policy.tennessee.edu/it_policy/it0126/). Information technology is a dynamic field, and these requirements will be updated as technology and accessibility-related issues evolve.

Information, Materials & Technology Accessibility Program

Each UT location must establish an IMT Accessibility Program. The purpose of an IMT Accessibility Program is to establish processes to address IT accessibility in a systematic fashion, using local structures and practices as appropriate. The Chancellor or other administrative head of the UT location must designate an individual and/or a committee to develop and oversee the Program and to promote coordination with system wide IMT accessibility initiatives. The 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 IMT 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, research, and administrative functions and to support IT accessibility for decentralized academic and research activities
3. **Prioritization:** A process to prioritize effort that takes into consideration local needs, practices and available resources, including providing access to centralized IMT 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 IT 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 IT related purchases

7. **Awareness Campaign:** A communication plan and campaign to raise awareness about IMT accessibility
8. **Compliance Monitoring:** Processes for monitoring compliance, including compliance with any standards listed in this Addendum A
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.

The Chair began a series of correspondence with Dr. High, Vice President for Academic Affairs and Student Success at the University of Tennessee, directed toward identifying mandated changes and possible interpretations. Specific questions dealing with the body of the policy are below as written:

Do we know the status for ATFR#2 with regard to the wording of the purchasing policy that is being re-evaluated and ATFR#9 which includes a definition of “Instructional Materials?” Finally, would you share your perspective with me regarding ARFR#8 designating responsibility and authority for oversight on accessibility issues?

The Chair was instructed to await a reply. The chair also met with senior administration at UTC on several occasions to explain policy and to identify potential issues.

Training (Chair: Dawn Ford, Walker Center for Teaching and Learning)

Provide training to all senior administrative areas for accessible media and document production, as well as technology access and planning.

The committee determined the best method for integrating a training program would be to begin at the university level and branch down into divisions, followed by colleges/areas, ending with units/departments. The subject content focused on the creation of accessible documents. The program was titled “Accessibility: What is it & Why Should you Care?” All Colleges have been represented in the training. Other

departments represented for 2015-16 are as follows:

- Office of the Chancellor
- Academic Affairs
- Disability Resource Center
- Enrollment Services
- Finance, Operations, and Information Technology
- Facilities Planning and Management
- Honors College
- Human Resources
- Library
- Office of Planning, Evaluation, and Institutional Research
- Records Office
- Division of Student Development
- University Relations

This session will continue to be offered through departments and areas and a new session will be offered for Senior Administration by the Walker Center for Teaching and Learning. The new session will offer advanced level accessibility training, including checking existing PDF files for accessibility and making existing PDF files accessible. The Walker Center produced a new training video on “[Choosing Accessible Textbooks](#)” and it has been posted to the ATI webpage.

Many faculty at UTC link to instructional videos they have created in their UTC Learn course spaces; however, many have not been captioned. To remedy this situation, UTC has entered into a contract with Autosync, a 3rd party video captioning and transcription service. For 2016-17, the Walker Center for Teaching and Learning will work with faculty to caption videos using some guiding policies that are under development.

Audit (Chairs: Tom Hoover, Information Technology and Nancy Badger, Division of Student Development)

This subcommittee works directly with end users to evaluate the accessibility of the most frequently used websites, software systems and textbook publishers. The audit committee developed the following initial technology purchase guidelines:

General:

- All software purchases must be initiated using a requisition regardless of the price of the software.
- All software purchases must be reviewed for accessibility by an ATI Review Team.
- The ATI Review Team will consist of at least one member from ITD and one member from The Disability Resource Center.
- ATI Review Team approved software will be added to an official approved software list for use with future purchases.

Purchase of Software:

- Generate a requisition for the purchase of software.
- Upon receipt of a software purchase requisition (including sole source purchase), Business Services will verify against official approval listing prior to processing the purchase request.
- If not on the approved list, the request will be forwarded to the ATI Review Team for review and approval prior to processing the request.

Purchase of Software requiring a bid process:

- Generate a requisition for the purchase of software.
- Forward specifications and proposed vendor list to ITD and Business Services for review and approval.
- Upon ITD approval of specifications, purchasing will initiate the bid process either as a request for proposal (RFP) or as a request for quote (RFQ).
- Purchasing will ensure that accessibility language is included and emphasized in the bid document requirements accompanying the specifications.
- RFP – ATI Review Team will assign at least one representative to serve on the evaluation committee.
- RFQ - ATI Review Team will review all responses from the bid process for compatibility and accessibility, and approve the final selection for purchase.

Other Items Accomplished

The ATI now serves as a recommendation committee for UTC's Technology Advisory Committee (TAC). Recommendations that impact technology and accessibility will be made to TAC from the ATI committee.

General web fixes related to accessibility were completed this year. ARIA landmark template enhancements were made, the ATI webpage was republished to incorporate these enhancements, and work has begun on accessible template for blog.utc.edu for news releases and other matters.

The Library's Special Collections is providing full text transcripts of handwritten and typewritten documents for our [locally digitized cultural heritage assets](#). For photographic materials, including postcards, detailed descriptions of the materials are provided, making them as accessible as possible. Transcripts are being developed for our A/V material, including the Ralph W. Hood and W. Paul Williamson Holiness Churches of Appalachia Recordings.

Library IT is leading a review of the library web site and all associated software to test for accessibility. For example, all of the customized code has been reviewed to make sure it was accessible, and other CMSs are being run through "Site Improve" to capture more of the accessibility issues that other free tools may not identify.

Library instruction is auditing all instructional materials, has captioned all video tutorials, and is now ensuring all text content is accessible.

Future Goals

Documentation of Issues: A procedure for addressing general process issues needs to be developed, such as:

- Document an issue.
- Generate reasonable, actionable items & a realistic timeline.
- Create recommended standards & processes, along with proposed resolutions &/or workarounds.
- Document the above on our website & increase education in a variety of ways.

- Provide the UTC Community with a maintained path to register existing and future accessible issues.

Web Content: All Web content and electronic publications should be made accessible to people with disabilities. If accessibility is not feasible, the information should be available by alternative means. Campus web editors are responsible for verifying that their pages meet all university requirements including accessibility guidelines. Introductory training sessions on web accessibility will be held for all web editors in the near future. The University Web Services team is the central contact for Web-related accessibility questions and concerns.

Training Tutorials: Video tutorials need to be created to enhance accessibility training efforts at UTC. These tutorials will demonstrate how to create accessible documents and media.

Implementation Plan

The original implementation plan is still in progress (Appendix B). In the ATI Implementation Plan, or timeline, the committee identified six (6) primary goals and numerous action items or objectives to accomplish those goals.

Goals:

- To communicate the Accessible Technology Initiative to the campus community and increase awareness of relevant standards, resources, and obligations
- To develop and implement relevant policies and procedures
- To identify and implement initial steps to improve accessibility at UTC
- To ensure accessibility of all instructional materials – print and electronic – and technologies
- To develop and implement professional development opportunities for faculty and staff
- To monitor and assess the accessibility of Instructional Materials and Technologies, or IMTs (formerly called electronic and information technologies) at UTC

Recommendations from the Higher Education Accessibility Task Force and the UT Accessibility Study Group are incorporated into the plan (Appendix C). The committee also

studied materials and webpages from other institutions and associations, and settlement agreements between higher education institutions and the Department of Education/Department of Justice (OCR). The “Dear Colleague Letter” related to accessible technology (2010) and subsequent FAQs issued by the Department of Justice Civil Rights Division. The Department of Education Office for Civil Rights also offered guiding principles for the creation of these goals, objectives and timeline (Appendix D).

Benchmarks and Assessment

The ATI Committee is responsible for monitoring and assessment of the initiative. During the initial year of implementation, the committee determined that reasonable benchmarks would follow the recommendations of the Higher Education Accessibility Task Force and the UT Accessibility Study Group. Additional benchmarks were derived from aforementioned settlement agreements and procedures followed by other institutions, such as Penn State University and California State University.

- All new IMTs, textbooks, software, and hardware are accessible - a Voluntary Product Accessibility Template (VPAT) is requested for each new adoption, where applicable (Appendix E)
- All IMTs – textbooks, webpages, syllabi/documents, videos, etc. – are accessible
- All webpages are accessible
- The ATI has a permanent budget
- A new full-time position – Accessibility Coordinator – is created and filled
- New faculty and staff receive training regarding accessibility standards and procedures

Baseline data are still being collected at the date of this report, but indications from the system level and other anecdotal information suggests that UTC has made significant progress in improving accessibility.

As recommended by the UT Accessibility Study Group, the committee agreed to take steps to ensure that new IMTs are accessible, rather than to complete an audit of all textbooks, webpages, videos, and other instructional materials, software, etc. Data will continue to be

collected that includes VPAT submission, use of the accessible syllabus template, number of major purchases conforming to accessibility standards, revision/creation of accessible webpages, participation in professional development opportunities related to accessibility, and progress on action items in the Implementation Plan.

Appendix A

The University of Tennessee at Chattanooga Accessible Technology Initiative

The Accessible Technology Initiative was implemented to guide the campus in ensuring that information technology resources and services are accessible to all students, faculty and staff at the University of Tennessee at Chattanooga.

Policy

All UTC programs, services, and activities should be accessible to all students, staff, faculty, and the general public. This encompasses all technology products used to deliver academic programs and services, student services, information technology services, and auxiliary programs and services.

UTC's Accessible Technology Initiative (ATI) implementation approach is driven by the following principles:

- Technology accessibility is an institution-wide responsibility that requires commitment and involvement from leadership across the enterprise.
- Technology access for individuals with disabilities must provide comparable functionality, affordability, and timeliness and should be delivered in as seamless a manner as possible.
- The implementation of Universal Design principles should reduce the need for, and costs associated with, individual accommodations for inaccessible technology products.

Procedure

- Require VPAT prior to purchase of instructional software prior to adoption
- Follow same procedure for other purchases
- Create an oversight committee – membership to include Associate Provost for Academic Affairs, and representatives from Disability Resource Center (2), Purchasing, Distance Education, IT, and 2 faculty members
- Consultation with the Office of General Counsel and ADA Coordinator, as appropriate

Goals and Success Indicators

Technology Accessibility Goals

- **Web Accessibility Evaluation Process:** Identify and repair or replace inaccessible websites, web applications, and digital content.
- **New Website/Web Application and Digital Content Design and Development Process:** New website/web application and digital content development meets campus accessibility standards.
- **Ongoing Monitoring Process:** Updating and maintenance of websites/web applications and digital content meet campus accessibility standards.
- **Exemptions and Alternatives Process:** Effective alternative formats are adopted for websites and content not meeting campus accessibility standards.
- **Training Process:** Professional development websites, web applications, and digital content meet campus accessibility standards.
- **Communication Process:** The campus community is aware of campus standards and guidelines to make web based information available to everyone (students, staff, faculty & the general public) regardless of disability.
- **Administrative Process:** Campus governance entities are aware of and kept informed about web accessibility.

Procurement Accessibility Goals

- **Procurement Procedures:** An ATI Electronic and Information Technology (E&IT) Procurement Plan, documents, forms, and other materials to support procurements at the campus are created and published.
- **Staffing or Role Definition:** ATI procurement team is fully staffed with clearly defined roles for processing E&IT procurements.
- **Equally Effective Access Plans:** Equally Effective Access Plans are created for E&IT products that are not fully compliant with accessibility standards.
- **Training:** All parties involved in E&IT procurement have been trained, and a continual training program is in place.
- **Outreach (Communications):** All individuals on campus involved in the purchasing of goods are knowledgeable about accessibility standards in the context of E&IT procurement.
- **Evaluation & Monitoring:** Campus has established a continual evaluation process with standard forms and procedures. Feedback from the process along with direction is provided to training, outreach, and other groups involved in E&IT procurements.
- **Experience/Implementation:** Campuses have sufficient experience and expertise in completing E&IT procurements.

Instructional Materials and Equipment Accessibility Goals

- **Timely Adoption:** The campus has implemented a comprehensive plan to ensure the timely adoption of textbooks and other instructional materials.
- **Identification of Instructional Materials for Late-Hire Faculty:** The campus has implemented a comprehensive plan to ensure that textbooks have been identified for courses with late-hire faculty.
- **Early Identification of Students with Disabilities:** The campus has implemented a comprehensive plan to ensure that students with disabilities can self-disclose and request alternate media materials in a timely manner.

- **Faculty Use of Learning Management Systems (or non-Learning Management System) Course Websites:** The campus has implemented policies and procedures to promote the posting of all required curricular and instructional resources (including learning management systems, print-based and multimedia materials) in a central, accessible electronic location.
- **Accessibility Requirements for Multimedia:** The campus has implemented policies and procedures to ensure that accessibility requirements have been incorporated into the adoption process for all multimedia-based instructional resources.
- **Accessibility Requirements for Curricular Review and Approval:** The campus has implemented policies and procedures to ensure that accessibility requirements have been incorporated into the curricular review process.
- **Supporting Faculty Creation of Accessible Instructional Materials:** The campus has implemented policies and procedures to support faculty in selecting, authoring, and delivering accessible instructional materials.
- **Communication Process and Training Plan:** The campus has implemented a broad-based ATI awareness campaign, supported by a comprehensive training infrastructure to increase technological accessibility across the campus.
- **Process Indicators:** Accessible Technology Initiative (ATI) Committee has sufficient breadth, resources, and authority to effectively implement a comprehensive ATI initiative

Review

- Responsible Administrator – Provost
- This operating procedure will be reviewed every three years by the Chair of the Policy Review Committee, with recommendations for revision presented to the Chancellor by – June 1. *For information about this policy, contact the Disability Resource Center.*

Authorization

Responsible Administrator: _____
 Provost Date

Policy Review Committee: _____
 Chairperson Date

Office of General Counsel: _____
 Assistant General Counsel Date

Chancellor:
 Chancellor Date effective

Accessible Technology Initiative - Implementation Plan and Timeline
Spring 2014 - Fall 2016

Target Date	Goal	Objective/Action Item	Responsible party	Comments	Status
Spring 2015	Ensure accessibility of all instructional materials - print and electronic - and technologies (Accessible IMTs)	Policy in place for posting syllabus in LMS in accessible format	Provost, Department Heads	Not yet a policy; Announcement from Provost to campus; syllabus template available each semester	In progress
July 1, 2015	Accessible IMTs	Prioritize webpages for accessibility evaluation and revision	Department Heads, unit supervisors	The UTC templates and top 20 pages were updated in December 2015 to eliminate WCAG 2A errors, to comply with a system mandate to have the most frequently visited pages compliant with the WAVE accessibility tool's 2A test via http://wave.webaim.org and visual inspection (mandate standard). ARIA landmarks were also added to the templates at that time.	In progress
Fall 2015	Accessible IMTs	Check book orders and other IMTs by department for accessibility; include in EDO	Department Heads	Need to identify an appropriate approach	Not started

Target Date	Goal	Objective/Action Item	Responsible party	Comments	Status
Fall 2015	Accessible IMTs	Timely textbook adoption plan implemented (CCTA)	Department Heads	Seek earlier adoption; bookstore has issued prompts to Deans and Department Heads with numbers for missing orders	Ongoing
Fall 2015	Accessible IMTs	Students able to self-disclose and request alternate media in timely manner	DRC	Post on DRC webpage	Completed
Fall 2015	Accessible IMTs	Policies in place to ensure that accessibility review is included in curricular review process	UG Curriculum Committee, Graduate Council, college curriculum committees	University Curriculum Committee has declined this request because the committee does not review course materials.	Completed
Fall 2015	Accessible IMTs	Policies and procedures in place to support faculty in selecting, authoring, and delivering accessible instructional materials	DRC, WCTL, IT	Bookstore, Library, and WCTL have materials and assistance already available	Ongoing

Target Date	Goal	Objective/Action Item	Responsible party	Comments	Status
December 31, 2015	Accessible IMTs	Identify and repair or replace inaccessible websites, web applications, and digital content; develop guidelines for units to review sites - priorities	ATI Committee, IT, Provost	Identifying, analyzing and fixing errors in editable content areas will require a training and certification program for web editors. Technology Advisory Council has been briefed re: a plan to reorganize campus web editors into a structure that will facilitate content review, training, and accountability. This structure would have a core group of web administrators, who would train and support 10-12 super-users, who in turn would support lower-level editors and review/approve all content edits and additions.	In progress
December 31, 2015	Accessible IMTs	Conduct accessibility audit	Tom Hoover	Utilizing NCDAE instrument; will also focus on CRMJ department as pilot	In progress
Spring 2016	Accessible IMTs	Train and prompt faculty to determine and ensure accessibility of IMTs, especially textbooks and print materials (not just required materials)	ATC, DH, Deans	Send blanket message to all faculty each term at beginning of textbook ordering period, reminder of ATI and their obligations, resources, and alternatives	Ongoing
Fall 2016	Accessible IMTs	Textbooks are identified for late hired faculty (CCTA)	Department Heads	Under discussion	Not started
Fall 2016	Accessible IMTs	Policies in place to ensure that new multimedia instructional materials are accessible	IT, Library, WCTL	No policies in place yet. Contract with 3 rd party captioning company (summer 2016) has expanded video captioning services.	In progress

Target Date	Goal	Objective/Action Item	Responsible party	Comments	Status
Fall 2016	Accessible IMTs	New instructional materials, content, and technology required to be accessible	Deans, Department Heads	Content delivery units - departments, library, etc. ultimately responsible for compliance; encouraging faculty to comply; gradual movement to policy/mandate	In progress
Fall 2016	Accessible IMTs	Require new website/web application and digital content development to meet campus accessibility standards; Update and maintain websites/web applications and digital content to meet accessibility standards	IT/Hoover, WCTL, Deans, Department Heads	Each unit must identify who will actually do this; gradual movement to policy/mandate	In progress
Fall 2016	Accessible IMTs	Adopt effective alternative formats for websites and content not meeting accessibility standards	IT/Hoover, WCTL, Deans, Department Heads	Need to communicate process and resources to campus	Ongoing
Fall 2016	Accessible IMTs	Monitor web accessibility	IT, ATI Committee	Must develop mechanism/approach to accomplish this, assign responsibility; awaiting guidance from UT system	In progress
Fall 2014	Communicate ATI to the campus community and increase awareness of relevant standards, resources, and obligations (Communication)	Announce ATI	Chancellor	Announcement made via email to campus	Completed

Target Date	Goal	Objective/Action Item	Responsible party	Comments	Status
Fall 2014	Communication	Develop brand – logo, slogan	Chuck Cantrell, April Cox, University Relations	Slogan: “Everyone Achieves”; mark selected in December 2014; approved by Chancellor January 2015	Completed
Spring 2015	Communication	Develop webpage	ATI committee	Initial planning with Chris Gilligan; provide content for Chris to build structure	Completed
Spring 2015	Communication	Communicate ATI standards to campus	ATI Committee (ATC), Provost, Chancellor	Chancellor and Provost have issued messages; tech fair completed; HR onboarding session underway; added to Instructional Excellence Retreat; add to new faculty orientation, visit department meetings in Fall	Ongoing
Spring 2015	Communication	ATI Technology Fair; recruit presenters; arrange logistics; publicize to faculty and staff	ATI sub-committee	February 22, 2015; UC Chattanooga Rooms, 2:00-4:00 p.m.; repeat in AY16	Completed; ongoing
Spring 2015	Communication	Develop PSAs; explore other video possibilities, such as tutorials	Chuck Cantrell, ATI subcommittee,	Joe Wilferth developed two versions; WCTL developed one video on textbooks.	Completed; ongoing
Spring 2015	Develop relevant policies and procedures (Policies and Procedures)	Add ATI compliance to EDO and SPDR standards	Provost, HR, Richard Brown	Kendra will talk to Dan Webb; need to talk with Provost; Provost's Council	In progress
Summer 2015	Policies and Procedures	Define role of ATI Committee for reviewing procurement process	ATI Committee, Purchasing	Developing process; need campus leadership approval	In progress

Target Date	Goal	Objective/Action Item	Responsible party	Comments	Status
June 2015	Policies and Procedures	Incorporate accessibility requirement into purchasing procedure; add to appropriate webpages; determine role of ATI committee; what will the review process look like? Communicate to campus; develop procedure to catch smaller purchases	Purchasing	Procedure added Fall 2014; does not catch small purchases; need to communicate to campus; add to appropriate webpages; devise means for ensuring that small purchases are compliant	In progress
Fall 2015	Policies and Procedures	Develop Electronic and Information Technology (EIT) procurement procedure; Communicate to campus new purchasing procedure	ATI Committee, IT, Purchasing	Procedure developed for purchases that require approval (\$5,000); new procurement system under development; new procedure not yet communicated	In progress
Spring 2016	Policies and Procedures	Evaluation process, forms, and procedures in place; feedback provided to appropriate units	Hoover, HR, ATI Committee	Develop process	Not started
Fall 2016	Policies and Procedures	Equally Effective Access Plans developed for non-compliant products	Purchaser (faculty or staff responsibility)	Assistance available from ATI Committee, IT, DRC	Ongoing; case-by-case
Fall 2016	Policies and Procedures	Training in place for EIT procurement; all staff trained	HR, Hoover, Deans, DH	Training added to HR new staff orientation; needed for IT staff and NFO	In progress
Spring 2014	Identify and implement initial steps to improve accessibility at UTC (Initial Steps)	Accessible Technology Initiative developed and approved (CCTA)	ATI Committee	Approved February 2014 by Executive Team; posted on Policies and Procedures webpage and Academic Affairs	Completed
Summer 2014	Initial Steps	Empanel an ATI oversight committee	Chancellor Angle	Representative of all campus divisions, colleges, and relevant units	Completed

Target Date	Goal	Objective/Action Item	Responsible party	Comments	Status
Fall 2014	Initial Steps	Join National Center for Disability and Access to Education	Tom Hoover		Completed
Fall 2014	Initial Steps	Send team to AT Summit	ATI, DRC, Housing, Student Development, IT, UTC Learn, WCTL	11 attended; September 17-18, 2014; add to AY16 budget	Completed
Spring 2015	Initial Steps	Acquire funding for the ATI for FY16	Provost, ATI chairperson	\$10,000 approved by Provost Ainsworth; included in "student success" dollars for FY16, or other resources	Completed
Spring 2015	Initial Steps	Send team to AHEAD Institute/conference, or other institution(s)	ATI Committee	Sanders and Rigler attended AHEAD institute for EITs, February 2015	Completed for 2015; annual attendance, or travel to other institutions
April 1, 2015	Initial Steps	Develop timeline for ATI	ATI Committee	Need to develop monitoring process as soon as possible	Completed
May 2015	Monitor and assess the accessibility of instructional materials and technologies , or IMTs (formerly called electronic and information technologies) at UTC (Monitoring and Assessment)	ATI Committee will provide annual reports to the Executive Team	ATI Committee	First annual report submitted May 2015; annual reports completed each year	Initiated; Ongoing

Target Date	Goal	Objective/Action Item	Responsible party	Comments	Status
Fall 2015	Monitoring and Assessment	Units across campus routinely/periodically monitor accessibility	Administrator of each unit	Identify an appropriate approach; involve representative shared-governance groups	Not started
July 2016	Monitoring and Assessment	Create new position - Accessibility Coordinator/Accessibility Analyst	Provost	Allocate permanent funding for the position, administrative support, and an operating budget; research funding at similar institutions; fund in FY17	Not started
Fall 2014	Professional development	Add accessibility component to OU training	Tom Hoover, IT	Added Fall 2014	Completed
Spring 2015	Professional development	Include accessibility standards and processes in new staff orientation ("onboarding")	Human Resources,	Sanders meeting with Pou 2/13/15; first session held 2/3/15 (Rigler); future sessions to be scheduled; rotation of presenters from ATC to be developed and/or video training	Ongoing
Spring 2015	Professional development	Develop professional development opportunities for faculty in accessibility issues	WCTL, ATI Committee	Develop and identify webinars, seminars, classes, etc.	Ongoing
Summer 2015	Professional development	Introduce syllabus template - webpage, tech fair; new faculty orientation	IT, WCTL	Available on WCTL webpage; tech fair introduction	Complete
Summer 2015	Professional development	Include ATI in new faculty and adjunct orientation, department head training	WCTL	Included in faculty orientation; need to add to Department Head training	In progress

Target Date	Goal	Objective/Action Item	Responsible party	Comments	Status
Fall 2015	Develop and implement professional development opportunities for faculty and staff (Professional development)	Provide tips for faculty to create accessible documents; provide links to tips in accommodation letters to faculty (DRC)	WCTL, ATI Committee, DRC	Faculty tips developed by Bryon Kluesner and Dawn Ford; posted on WCTL webpage; on ATI webpage	Completed
Fall 2015	Professional development	Syllabus workshop/road show	WCTL	A link to the syllabus template is emailed to faculty several weeks before the beginning of each semester.	Ongoing

Recommendations of the Higher Education Accessibility Task Force

- 1) TBR and UT should develop and implement policies concerning the deployment of accessible information materials and technologies (IMTs) and digital curricula in the college and university setting. “Accessible” means that individuals with disabilities are able to independently acquire the same information, engage in the same interactions, and enjoy the same services within the same timeframe as individuals without disabilities, with substantially equivalent ease of use.
- 2) TBR and UT should develop and implement procedures that require colleges and universities to purchase or recommend only accessible information materials and technologies (IMTs), if an accessible IMT is commercially available and its purchase would not result in undue financial and administrative burdens or a fundamental alteration. TBR and UT should effectuate these obligations by implementing as a part of its RFP process:
 - a. language that bidders meet the accessibility standards set forth in Web Content Accessibility Guidelines 2.0 Level A & AA standard (“WCAG 2.0 A & AA”) for web-based technology (or subsequently developed guidelines) or EPUB3, Section 508 of the Rehabilitation Act and the Americans with Disabilities Act;
 - b. requiring, at the college or university’s discretion, as part of any contract with its vendors, provisions by which:
 - i. the vendor warrants that any IMT provided complies with WCAG 2.0 A & AA for web-based technology (or subsequently developed guidelines) or EPUB3, Section 508 of the Rehabilitation Act and the Americans with Disabilities Act; and
 - ii. the vendor is required to provide accessibility testing results and written documentation verifying accessibility, to promptly respond to and resolve accessibility complaints, and to indemnify and hold the University harmless in the event of claims arising from inaccessibility.
- 3) UT and TBR should examine the feasibility of issuing joint RFP(s) for state-wide vendor(s) to provide accessible IMTs and services for students with disabilities.
- 4) By December 31, 2015, TBR and UT both should complete an accessibility audit of a representative sample of its IMTs that will examine the accessibility of the IMTs provided by colleges and universities to students and prospective students who have disabilities. The audit should examine various types of the IMTs, including college/university websites, library services, course management systems and course registration software. By March 31, 2016, TBR and UT both should develop an IMT corrective action plan based on the audit findings. Strategies should include priorities for making IMT accessible, a schedule for making IMT accessible, and a plan to

periodically monitor the accessibility of IMTs. Strategies should be reviewed by THEC and approved by the respective system's board.

Recommendations of the Higher Education Accessibility Task Force

- 5) By December 31, 2015, UT and TBR both should complete an accessibility audit of a representative sample of its textbooks that will examine their accessibility by students with disabilities.
- 6) TBR and UT should provide and make readily available to faculty and staff, who develop or post content on a website or through other IMTs, training and information on how to make digital information accessible and how to use automated tools to check and ensure the accessibility of content.
- 7) No later than December 31, 2015, all pages hosted on college/university websites that have been published or updated on or after June 1, 2014 should be accessible according to WCAG 2.0 A & AA. Any other pages should promptly be made accessible upon request or the information made available in a timely manner and in an accessible format to the individual who made the request. This requirement should not apply to personal pages; however, TBR and UT should provide resources to authors of pages to give guidance on making such pages accessible.
- 8) TBR and UT should designate at least one staff member at each campus who will have responsibility and commensurate authority for oversight of accessibility issues. This person should also serve as the contact to answer questions and assist with informal dispute resolution relating to accessibility issues.
- 9) "Instructional Materials" are items that are created, purchased or identified to serve in instruction and communication of information in the curricular settings at public higher education institutions in Tennessee. These items may include, but are not limited to, textbooks in bound, unbound, kit or package form, library media (print, non-print, and electronic resources), instructional software content, web/online content and learning objects, E-books, CD-ROM, DVDs, videos, slides, films and filmstrips, learning laboratories, recordings, manipulatives, consumables and ITV content.

Frequently Asked Questions about the June 29, 2010, Dear Colleague Letter¹

General Issues

1. Does the June 29, 2010, Dear Colleague Letter (DCL) on access to electronic book readers impose new legal obligations?

A: No. The DCL discusses long-standing law. Specifically, it addresses key principles of Federal disability discrimination law: the obligation to provide an equal opportunity to individuals with disabilities to participate in, and receive the benefits of, the educational program, and the obligation to provide accommodations or modifications when necessary to ensure equal treatment. Under Section 504 of the Rehabilitation Act of 1973 (Section 504), these legal standards apply to entities that receive Federal financial assistance, including elementary, secondary, and postsecondary institutions. (In this FAQ, the term “schools” refers to all these types of institutions.) Under Title II of the Americans with Disabilities Act (ADA) of 1990 (Title II), these obligations apply to entities of state and local government, including public schools.²

The DCL outlines concerns on the part of the Department of Justice (DOJ) and the Department of Education (Department), raised in the context of their resolution of several cases, regarding compliance with these long-standing requirements.

¹ The Department of Education has determined that this document is a “significant guidance document” under the Office of Management and Budget’s Final Bulletin for Agency Good Guidance Practices, 72 Fed. Reg. 3432 (Jan. 25, 2007), *available at* http://www.whitehouse.gov/sites/default/files/omb/assets/regulatory_matters_pdf/012507_good_guidance.pdf. OCR issues this and other policy guidance to provide recipients with information to assist them in meeting their obligations and to provide members of the public with information about their rights under the civil rights laws and implementing regulations that we enforce. OCR’s legal authority is based on those laws and regulations. This document does not add requirements to applicable law, but provides information and examples to inform recipients about how OCR evaluates whether covered entities are complying with their legal obligations. If you are interested in commenting on this guidance, please send an e-mail with your comments to OCR@ed.gov, or write to us at the following address: Office for Civil Rights, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, DC 20202.

² The Department of Justice is responsible for enforcing Title III of the ADA, which prohibits discrimination on the basis of disability by private schools, among other entities.

Specifically, some postsecondary institutions were using electronic book readers that are inaccessible to students who are blind or have low vision. As explained by the DCL, application of our long-standing nondiscrimination requirements means that schools must provide an electronic book reader (*i.e.*, the technology that the school uses to provide educational benefits, services, or opportunities) that is fully accessible to students who are blind or have low vision; otherwise schools must provide accommodations or modifications to ensure that the benefits of their educational program are provided to these students in an equally effective and equally integrated manner.

For the purposes of assessing whether accommodations or modifications in the context of emerging technology, and, more specifically, electronic book readers, meet the compliance requirements, the DCL provides a functional definition of accessibility for students who are blind or have low vision. Under this definition, these students must be afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as sighted students. In addition, although this might not result in identical ease of use compared to that of students without disabilities, it still must ensure equal access to the educational benefits and opportunities afforded by the technology and equal treatment in the use of such technology. The DCL uses the term “substantially equivalent ease of use” to describe this concept. For more information and for examples that meet this standard, see Questions 11, 12, and 14.

2. Does the DCL apply in the context of students with other disabilities that affect the ability to use printed materials?

A: Yes. Other disabilities, such as specific learning disabilities, may make it difficult for students to get information from printed sources (often called “print disabilities”). In its provision of benefits, services, and opportunities, a school must ensure that these students are not discriminated against as a result of inaccessible technology.

Example: A student has a learning disability in reading but does not have impaired vision. The student is currently receiving audiobooks on cassette tape for her history class because she cannot readily process printed information. The school is replacing the history textbooks with electronic book readers as the principal means of conveying curriculum content, including all homework assignments. In this example, the electronic book readers provide greater functionality than audiobooks provide, with the result that an audiobook would not afford the benefits of the educational program in an equally effective and equally integrated manner. For this reason the school may not continue to rely on audiobooks to provide equal access to the curriculum. For more information on the differences between traditional alternative media, such as audiobooks, and emerging technology, such as electronic book readers, see Question 12.

3. Does the DCL mean that schools cannot use emerging technology?

A: No. On the contrary, the Department encourages schools to employ innovative learning tools. Because technology is evolving, it has the capability to enhance the academic experience for everyone, especially students with disabilities. Innovation and equal access can go hand in hand. The purpose of the DCL is to remind everyone that equal access for students with disabilities is the law and must be considered as new technology is integrated into the educational environment.

4. Does the DCL apply to elementary and secondary schools?

A: Yes. The DCL grew out of complaints filed with the Department’s Office for Civil Rights (OCR) and DOJ that concerned postsecondary education. However, the principles underlying the DCL — equal opportunity, equal treatment, and the obligation to make accommodations or modifications to avoid disability-based discrimination — also apply to elementary and secondary schools under the general nondiscrimination provisions in Section 504 and the ADA. The application of these principles to elementary and secondary schools is also supported by the requirement to provide a free appropriate public education (FAPE) to students with disabilities. For more information, see Question 13.

5. Does the DCL apply to all school operations and all faculty and staff?

A: Yes. All school operations are subject to the nondiscrimination requirements of Section 504 and the ADA. Thus, all faculty and staff must comply with these requirements.

Section 504 and the ADA require that covered entities designate at least one person to coordinate their compliance efforts, and that they adopt and publish grievance procedures to resolve complaints of noncompliance. In addition, postsecondary schools often designate certain staff or offices (sometimes referred to as disability student- services offices) to assist students with disabilities.

The law applies to all faculty and staff, not just a Section 504 or ADA coordinator or staff members designated to assist students with disabilities. All faculty and staff must comply with the nondiscrimination requirements of Section 504 and the ADA in their professional interactions with students, because these interactions are part of the operations of the school. So, for example, if an adjunct faculty member denies a student who is blind an equal opportunity to participate in a course by assigning inaccessible course content, the school can be held legally responsible for the faculty member’s actions. Therefore, schools should provide, and faculty and staff should participate in, professional development about accessibility and emerging technology, and about the role of faculty and staff in helping the school to comply with disability discrimination laws.

Applying the DCL in Different Contexts

6. Does the DCL apply beyond electronic book readers to other forms of emerging technology?

A: Yes. The core principles underlying the DCL — equal opportunity, equal treatment, and the obligation to make modifications to avoid disability-based discrimination — are part of the general nondiscrimination requirements of Section 504 and the ADA. Therefore, all school programs or activities — whether in a “brick and mortar,” online, or other “virtual” context — must be operated in a manner that complies with Federal disability discrimination laws.

7. Does the DCL apply to online courses and other online content, such as online applications for admission, class assignments, and housing?

A: Yes. The principles in the DCL apply to online programs that are part of the operations of the school, *i.e.*, provided by the school directly or through contractual or other arrangements.

8. Does the DCL apply to pilot programs or other school programs that are of short duration?

A: Yes. The complaints discussed in the DCL were based on pilot programs that were part of the schools’ operations. As noted in Question 5 above, all school programs and activities are subject to the nondiscrimination requirements of Section 504 and the ADA.

9. Does the DCL apply when planning to use an emerging technology in a class or school where no students with visual impairments are currently enrolled?

A: Yes. Schools that are covered under Section 504 and the ADA have a continuing obligation to comply with these laws. Therefore, the legal obligations described in the DCL always apply. Just as a school system would not design a new school without addressing physical accessibility, the implementation of an emerging technology should always include planning for accessibility. Given that tens of thousands of elementary, secondary, and postsecondary students have visual impairments and that the composition of the student body at a given school may change quickly and unexpectedly, the use of emerging technology at a school without currently enrolled students with visual impairments should include planning to ensure equal access to the educational opportunities and benefits afforded by the technology and equal treatment in the use of such technology. The planning should include identification of a means to provide immediate delivery of accessible devices or other technology necessary to ensure accessibility from the outset.

Putting the DCL’s Principles Into Practice

10. What questions should a school ask in determining whether emerging technology is accessible, or can be made accessible, to students with disabilities?

A: Schools should begin by considering accessibility issues up front, when they are deciding whether to create or acquire emerging technology and when they are planning how the technology will be used. To that end, schools should include accessibility requirements and analyses as part of their acquisition procedures. Schools should keep in mind their obligation to ensure that students with disabilities receive the benefits of the educational program in an equally effective and equally integrated manner. Among the questions a school should ask are:

- What educational opportunities and benefits does the school provide through the use of the technology?
- How will the technology provide these opportunities and benefits?
- Does the technology exist in a format that is accessible to individuals with disabilities?
- If the technology is not accessible, can it be modified (see Question 11 below about additional questions related to modifications), or is there a different technological device available, so that students with disabilities can obtain the educational opportunities and benefits in a timely, equally effective, and equally integrated manner?

Example: A school intends to establish a Web mail system so that students can: communicate with each other and with faculty and staff; receive important messages from the school (*e.g.*, a message about a health or safety concern); and communicate with individuals outside the school. The school must ensure that the educational benefits, services, and opportunities provided to students through a Web mail system are provided in an equally effective and equally integrated manner. Before deciding what system to purchase, the school should make an initial inquiry into whether the system is accessible to students who are blind or have low vision, *e.g.*, whether the system is compatible with screen readers and whether it gives users the option of using large fonts. If a system is not accessible as designed, the school must take further action to determine whether an accessible product is available, or whether the inaccessible product can be modified so that it is accessible to students who are blind or have low vision.

11. The DCL states that where accessible technology is not available, a school can comply with Section 504 and the ADA if it provides students with disabilities “accommodations or modifications that permit them to receive all the educational benefits provided by the technology in an equally effective and equally integrated manner.” From a practical standpoint, what questions should schools ask to determine if this standard can be met?

A: In making this determination, the questions a school should ask include:

- What educational opportunities and benefits does the school provide through the use of this technology?
- What can the school do to provide students with disabilities equal access to the educational benefits or opportunities provided through the use of the technology?
- How will the educational opportunities and benefits provided to students with disabilities compare to the opportunities and benefits that the technology provides to students without disabilities? Three relevant questions are:
 - Are all the educational opportunities and benefits that are available through the use of the technology equally available to students with disabilities through the provision of accommodations or modifications (*i.e.*, do students with disabilities have the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as sighted students)?
 - Are the educational opportunities and benefits provided to students with disabilities in as timely a manner as those provided to students without disabilities (*i.e.*, do the time frames under which opportunities and benefits are received by students meet the requirement that students with disabilities be provided benefits and opportunities in an equally effective and equally integrated manner)?
 - Will it be more difficult for students with disabilities to obtain the educational opportunities and benefits than it is for students without disabilities (*i.e.*, does ease of use for students with disabilities meet the requirement that students with disabilities be provided benefits and opportunities in an equally effective and equally integrated manner)?

Example: A high school teacher creates an online course that includes instruction, posting of assignments and other course content, and a forum where students can discuss their course work with the teacher and each other. The teacher would like to incorporate video clips into the course, but is unable to obtain the video clips with audio

descriptions. As a modification, the teacher creates separate audio descriptions for each video clip that narrate what is taking place in the video, and places them in a separate section of the online course. The online course includes links that enable persons who use screen readers to bypass the video clips completely and instead listen to the audio descriptions. Here, the use of detailed audio descriptions that are a part of the online course would provide students with disabilities access to the same opportunities and benefits in an equally effective and equally integrated manner.

Schools should also think about whether other accommodations may be needed to provide equal access. For example, a student who uses a screen reader may need extra time to take an online examination because it may take time for the screen reader to process information displayed on a screen and provide that information to the student.

12. Are there circumstances under which it would be appropriate for a school to provide traditional alternative media, such as books on tape, to a student who is blind or have low vision?

A: Yes. Traditional alternative media can still be used as an accommodation under appropriate circumstances. For example, if a school provides printed books to students in a class, books on tape may be an appropriate accommodation for a blind student.

The DCL does not require schools to use emerging technology. If, however, a school chooses to provide emerging technology and proposes traditional alternative media as an accommodation or modification to provide equal access to the educational opportunities and benefits provided to all students, the alternative media must provide access to the benefits of technology in an equally effective and equally integrated manner. Some forms of emerging technology may readily offer students educational opportunities and benefits that traditional alternative media cannot replicate.

13. If a student who is blind or has low vision makes a request for a particular emerging technology, and that technology currently is not used for all students, must the school provide it?

A: Not necessarily, because such decisions are individualized. The DCL does not change the requirements and processes by which elementary and secondary schools must provide a free appropriate public education, or FAPE, to students with disabilities; nor does the DCL change the processes by which postsecondary schools provide academic adjustments and auxiliary aids to students with disabilities. Rather, the DCL discusses the issue of how Section 504 and the ADA apply if schools choose to incorporate emerging technology into their instruction or other programs or activities for all students.

At the elementary and secondary school levels, if parents believe that their child with a disability requires a particular emerging technology as part of the child's right to FAPE, even though that technology currently is not used for all students, an individualized decision about providing a specific technology should be made through the processes

used by the school district to make educational decisions consistent with Section 504 or the Individuals with Disabilities Education Act as applicable. At the postsecondary level, a decision about whether to provide a particular emerging technology as an auxiliary aid or service, even though such technology currently is not used for all students, is an individualized one that should be made through any procedure that the school may have established to consider students' requests for auxiliary aids or services. Postsecondary institutions' procedures must comply with Section 504 and the ADA.

14. Must a school always provide the same form of emerging technology to a student who is blind or has low vision as it provides to all other students?

No: The legal duty imposed by Section 504 and Title II is to provide equal opportunity — that is, to provide the student who has a disability with access to the educational benefit at issue in an equally effective and equally integrated manner. As described more fully in Question 1, a school must apply this standard in determining whether the use of a particular technological device for a student with a visual impairment is appropriate.

Example: A school library plans to make electronic books available to students by loaning electronic book readers. The school does not, prior to purchase, make necessary inquiries about whether the book readers are accessible to students who are blind or have low vision.

The school subsequently determines that the book readers are not accessible. In an effort to ensure that the educational benefits, *i.e.*, the same library books, are available in an equally effective and equally integrated manner to students with visual impairments, the school purchases a few small, light-weight tablet computers for the library. These tablet computers are designed to serve as a platform for electronic books, as well as other visual and audio media. If the tablet computers can access those electronic books and have accessible text-to-speech³ functions that allow users to hear the on-screen content read aloud, navigate device controls, and select menu items with the same ease of use afforded by the electronic book readers to sighted students, the tablet computers will then provide the same content and functionality to students with visual impairments.⁴ In this example, the tablet computers have those features. As a result, the accommodation or modification would meet the standards articulated in the DCL because it provides the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as sighted students, as well as meet the standards in the DCL for ease of use.

³ A text-to-speech function is software that provides audio for the printed words, enabling a person to hear instead of having to see the printed material.

⁴ The text-to-speech function of the tablet computers provides, for example: electronic book text that is accurate and presented in proper reading order; descriptions of graphical and other non-textual material (*e.g.*, a narrative description of a photograph); and proper presentation of material contained in tables (*e.g.*, properly associating row and column headers with their respective cell data).

In addition, the school purchases the tablet computers in sufficient numbers to loan them to students with visual impairments under the same terms and conditions as it provides the electronic book readers to sighted students. Here, the timely provision of electronic books on accessible tablet computers provides students with visual impairments access to the same educational opportunities and benefits in an equally effective and equally integrated manner.

An accommodation that would not be appropriate in this example would be simply providing a student with an aide to read an electronic book to the student. An aide who is available to read the electronic book to the student only at the school during designated times would not be equivalent to the access provided to sighted students using electronic book readers who would be able to read their library books any time and at any location.

Other Federal Guidance

15. Is there any other information available from the Federal government that offers additional guidance about accessibility and emerging technology?

A: Yes. Additional sources of guidance and information include:

U.S. Department of Education

- a. U.S. Department of Education Office of Educational Technology, National Education Technology Plan, <http://www.ed.gov/technology/netp-2010>.
- b. Advisory Commission on Accessible Instructional Materials in Postsecondary Education for Students with Disabilities, <http://www2.ed.gov/about/bdscomm/list/aim/index.html>.

U.S. Department of Education Grantees

Accessible Media Production and Dissemination

- c. National Instructional Materials Access Center (NIMAC), <http://www.nimac.us>.
- d. Bookshare for Education, <http://www.bookshare.org>.
- e. Described and Captioned Media Program, <http://www.dcmp.org>.
- f. Learning Ally (formerly Recording for the Blind & Dyslexic), <http://www.learningally.org>.

- g. National Instructional Materials Accessibility Standard Center (NIMAS Center), <http://aim.cast.org/collaborate/NIMASCtr>.
- h. The American Printing House for the Blind (APH), <http://www.aph.org>.
- i. The World Wide Web Consortium (W3C), <http://www.w3.org/standards/>.
- j. The Center for Implementing Technology in Education (CITEd), <http://www.cited.org>.
- k. The Family Center on Technology and Disability (FCTD),
<http://www.fctd.info>. Technical Assistance and Training
- l. National Center on Accessible Instructional Materials (AIM Center), <http://aim.cast.org>.

U.S. Department of Justice

- m. Advance Notice of Proposed Rulemaking, Nondiscrimination on the Basis of Disability: Accessibility of Web Information and Services of State and Local Government Entities and Public Accommodations, 75 Fed. Reg. 43,460 (July 26, 2010), *available at* <http://www.regulations.gov/#!documentDetail;D=DOJ-CRT-2010-0005-0001>.
- n. ADA Best Practices Tool Kit for State and Local Governments, Chapter 5: Website Accessibility Under Title II of the ADA,
<http://www.ada.gov/pcatoolkit/chap5toolkit.htm>.

Architectural and Transportation Barriers Compliance Board (U.S. Access Board)

- o. Advance Notice of Proposed Rulemaking, Americans with Disabilities Act (ADA) Accessibility Guidelines for Buildings and Facilities; Telecommunications Act Accessibility Guidelines; Electronic and Information Technology Accessibility Standards (regarding Section 508 of the Rehabilitation Act), 75 Fed. Reg. 13,457 (March 22, 2010), *available at* <http://www.access-board.gov/sec508/refresh/notice.htm>. (*Note: Section 508 of the Rehabilitation Act applies only to the Federal government.*)

U.S. General Services Administration

- p. Section 508.gov website, www.Section508.gov.

VPAT™

Voluntary Product Accessibility Template®

Version 1.3

The purpose of the **Voluntary Product Accessibility Template**, or **VPAT™**, is to assist Federal contracting officials and other buyers in making preliminary assessments regarding the availability of commercial “Electronic and Information Technology” products and services with features that support accessibility. It is assumed and recommended that offerers will provide additional contact information to facilitate more detailed inquiries.

The first table of the Template provides a summary view of the Section 508 Standards. The subsequent tables provide more detailed views of each subsection. There are three columns in each table. Column one of the Summary Table describes the subsections of subparts B and C of the Standards. The second column describes the supporting features of the product or refers you to the corresponding detailed table, e.g., “equivalent facilitation.” The third column contains any additional remarks and explanations regarding the product. In the subsequent tables, the first column contains the lettered paragraphs of the subsections. The second column describes the supporting features of the product with regard to that paragraph. The third column contains any additional remarks and explanations regarding the product.

Date:

Name of Product:

Contact for more Information (name/phone/email):

<p><i>Summary Table</i></p> <p>VPAT™</p> <p>Voluntary Product Accessibility Template®</p>		
<i>Criteria</i>	Supporting Features	Remarks and explanations
Section 1194.21 Software Applications and Operating Systems		
Section 1194.22 Web-based Internet Information and Applications		
Section 1194.23 Telecommunications Products		
Section 1194.24 Video and Multi- media Products		

Section 1194.25 Self-Contained, Closed Products		
Section 1194.26 Desktop and Portable Computers		
Section 1194.31 Functional Performance Criteria		
Section 1194.41 Information, Documentation and Support		

Section 1194.21 Software Applications and Operating Systems – Detail

VPAT™

Voluntary Product Accessibility Template®

<i>Criteria</i>	Supporting Features	Remarks and explanations
(a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.		
(b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.		
(c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that Assistive Technology can track focus and focus changes.		

<p>(d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to Assistive Technology. When an image represents a program element, the information conveyed by the image must also be available in text.</p>		
<p>(e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.</p>		
<p>(f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.</p>		
<p>(g) Applications shall not override user selected contrast and color selections and other individual display attributes.</p>		
<p>(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.</p>		
<p>(i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.</p>		
<p>(j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided.</p>		
<p>(k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.</p>		
<p>(l) When electronic forms are used, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.</p>		

Section 1194.22 Web-based Internet information and applications –

Detail VPAT™

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<i>Criteria</i>	Supporting Features	Remarks and explanations
(a) A text equivalent for every non- text element shall be provided (e.g., via "alt", "longdesc", or in element content).		
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.		
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.		
(d) Documents shall be organized so they are readable without requiring an associated style sheet.		
(e) Redundant text links shall be provided for each active region of a server-side image map.		
(f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.		
(g) Row and column headers shall be identified for data tables.		
(h) Markup shall be used to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.		
(i) Frames shall be titled with text that facilitates frame identification and navigation		
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.		

(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished		
in any other way. The content of the text-only page shall be updated whenever the primary page changes.		
(l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology.		
(m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).		
(n) When electronic forms are designed to be completed on-line, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.		
(o) A method shall be provided that permits users to skip repetitive navigation links.		
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.		

Note to 1194.22: The Board interprets paragraphs (a) through (k) of this section as consistent with the following priority 1 Checkpoints of the Web Content Accessibility Guidelines 1.0 (WCAG 1.0) (May 5 1999) published by the Web Accessibility Initiative of the World Wide Web Consortium: Paragraph (a) - 1.1, (b) - 1.4, (c) - 2.1, (d) - 6.1, (e) - 1.2, (f) - 9.1, (g) - 5.1, (h) - 5.2, (i) - 12.1, (j) - 7.1, (k) - 11.4.

Section 1194.23 Telecommunications Products

- Detail

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Criteria	Supporting Features	Remarks and explanations
<p>(a) Telecommunications products or systems which provide a function allowing voice communication and which do not themselves provide a TTY functionality shall provide a standard non-acoustic connection point for TTYs. Microphones shall be capable of being turned on and off to allow the user to intermix speech with TTY use.</p>		
<p>(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.</p>		
<p>(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.</p>		
<p>(d) Voice mail, messaging, auto- attendant, and interactive voice response telecommunications systems that require a response from a user within a time interval, shall give an alert when the time interval is about to run out, and shall provide sufficient time for the user to indicate more time is required.</p>		
<p>(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.</p>		

<p>(f) For transmitted voice signals, telecommunications products shall provide a gain adjustable up to a minimum of 20 dB. For incremental volume control, at least one intermediate step of 12 dB of gain shall be provided.</p>		
<p>(g) If the telecommunications product allows a user to adjust the receive volume, a function shall be provided to automatically reset the volume to the default level after every use.</p>		
<p>(h) Where a telecommunications product delivers output by an audio transducer which is normally held up to the ear, a means for effective magnetic wireless coupling to hearing technologies shall be provided.</p>		
<p>(i) Interference to hearing technologies (including hearing aids, cochlear implants, and assistive listening devices) shall be reduced to the lowest possible level that allows a user of hearing technologies to utilize the telecommunications product.</p>		
<p>(j) Products that transmit or conduct information or communication, shall pass through cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable format. Technologies which use encoding, signal compression, format transformation, or similar techniques shall not remove information needed for access or shall restore it upon delivery.</p>		
<p>(k)(1) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be tactilely discernible without activating the controls or keys.</p>		

<p>(k)(2) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be operable with one hand and shall not require tight grasping, pinching, twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2N) maximum.</p>		
<p>(k)(3) Products which have mechanically operated controls or keys shall comply with the following: If key repeat is supported, the delay before repeat shall be adjustable to at least 2 seconds. Key repeat rate shall be adjustable to 2 seconds per character.</p>		
<p>(k)(4) Products which have mechanically operated controls or keys shall comply with the following: The status of all locking or toggle controls or keys shall be visually discernible, and discernible either through touch or sound.</p>		

Section 1194.24 Video and Multi-media Products – Detail

VPAT™

<i>Criteria</i>	Supporting Features	Remarks and explanations
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<p>a) All analog television displays 13 inches and larger, and computer equipment that includes analog television receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals. As soon as practicable, but not later than July 1, 2002, widescreen digital television (DTV) displays measuring at least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically, and stand-alone DTV tuners, whether or not they are marketed with display screens, and computer equipment that includes DTV receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals.</p>		
<p>(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.</p>		
<p>(c) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain speech or other audio information necessary for the comprehension of the content, shall be open or closed captioned.</p>		
<p>(d) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain visual information necessary for the comprehension of the content, shall be audio described.</p>		
<p>(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.</p>		

Section 1194.25 Self-Contained, Closed Products – Detail

VPAT™

<i>Criteria</i>	Supporting Features	Remarks and explanations
(a) Self-contained products shall be usable by people with disabilities without requiring an end- user to attach Assistive Technology to the product. Personal headsets for private listening are not Assistive Technology.		
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.		
(c) Where a product utilizes touchscreens or contact-sensitive controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).		
(d) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.		
(e) When products provide auditory output, the audio signal shall be provided at a standard signal level through an industry standard connector that will allow for private listening. The product must provide the ability to interrupt, pause, and restart the audio.		
(f) When products deliver voice output in a public area, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. Where the ambient noise level of the environment is above 45 dB, a volume gain of at least 20 dB above the ambient level shall be user selectable. A function shall be provided to automatically reset the volume to the default level after every use.		
(g) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.		

<p>(h) When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided.</p>		
<p>(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.</p>		
<p>(j) (1) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: The position of any operable control shall be determined with respect to a vertical plane, which is 48 inches in length, centered on the operable control, and at the maximum protrusion of the product within the 48 inch length on products which are freestanding, non-portable, and intended to be used in one location and which have operable controls.</p>		
<p>(j)(2) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is 10 inches or less behind the reference plane, the height shall be 54 inches maximum and 15 inches minimum above the floor.</p>		
<p>(j)(3) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is more than 10 inches and not more than 24 inches behind the reference plane, the height shall be 46 inches maximum and 15 inches minimum above the floor.</p>		
<p>(j)(4) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Operable controls shall not be more than 24 inches behind the reference plane.</p>		

Section 1194.26 Desktop and Portable Computers – Detail

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<i>Criteria</i>	Supporting Features	Remarks and explanations
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).		
(b) If a product utilizes touchscreens or touch- operated controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).		
(c) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.		
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards		

Section 1194.31 Functional Performance Criteria – Detail

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<i>Criteria</i>	Supporting Features	Remarks and explanations
(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for Assistive Technology used by people who are blind or visually impaired shall be provided.		

(b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for Assistive Technology used by people who are visually impaired shall be provided.		
(c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for Assistive Technology used by people who are deaf or hard of hearing shall be provided		
(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.		
(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.		
(f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided.		

Section 1194.41 Information, Documentation and Support – Detail

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<i>Criteria</i>	Supporting Features	Remarks and explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge		

<p>(b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.</p>		
<p>(c) Support services for products shall accommodate the communication needs of end-users with disabilities.</p>		