

EvCC7040P: Accessible Technology and Media Procedure

Original Date: May 22, 2018

Procedure Contact: IT Accessibility Coordinator

CONTEXT

This procedure implements the College's [Accessible Technology and Media Policy \(EvCC7040\)](#) in order to ensure the accessibility of covered technologies and services procured by the College or developed by its employees.

PROCEDURE

1. Accessibility Standards

Covered technologies procured by or developed at the College must conform to Level AA of the [Web Content Accessibility Guidelines \(WCAG\) 2.0](#) or other comparable standards that are either equivalent to, or more stringent than, the [Minimum Accessibility Standard](#) identified in Washington OCIO Policy 188.

2. Information Technology Accessibility Coordinator

Everett Community College's IT Accessibility Coordinator will act as the primary contact for questions about accessible technology procurement and will assist in accessibility evaluation and complaint resolution efforts. The IT Accessibility Coordinator will also coordinate the filing of waivers and related documentation as required by applicable state policies.

3. Procurement and Development of Covered Technologies

The College's software and hardware request processes will include, at a minimum, a review of the Voluntary Product Accessibility Template (VPAT) provided by a prospective supplier or equivalent documentation of accessibility. When a VPAT or equivalent documentation indicates significant deficiencies, or when no VPAT is available, the requesting individual or department will need to work with the vendor, the IT Department, and other appropriate departments at the College to determine whether it meets the relevant accessibility standards.

When possible, and to the extent allowed by other College policies and procedures, new purchase orders or contracts for covered technologies should include the following statement or equivalent language:

"Contractor acknowledges that no College funds may be expended to purchase or license information technology equipment, software, or media unless they conform to Level AA of the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0 or substantially equivalent standards, where applicable. In addition, Contractor acknowledges that such information technology equipment, software, and media must provide equal and effective access to all individuals in accordance with federal law and the laws and regulations of the State of Washington, including but not limited to the Americans with Disabilities Act of 1990 and Sections 504 and 508 of the 1973 Rehabilitation Act. Contractor agrees to provide a Voluntary Product Accessibility Template (VPAT) reflecting the current accessibility status of the technology equipment, software, or media within sixty (60) days of receipt of a written request for such information. The College may, at its sole discretion, terminate this agreement immediately should these accessibility requirements not be met."

4. Exemptions

When procurement of a covered technology is deemed essential to College operations but the technology does not meet the accessibility standards referenced above, a temporary exemption may be requested. If granted, an exemption will allow provisional use of the covered technology for a limited period of time. It is the responsibility of the individual or department requesting the exemption to allow adequate time for its review.

Requests for exemption must be submitted in writing to the IT Accessibility Coordinator and include the following information:

1. The specific sections of the relevant accessibility policies and/or standards for which the exemption is needed.
2. A description of the extent to which the technology does not currently comply with these sections.
3. An explanation of the factors that prevent compliance.
4. A description of the risks resulting from noncompliance, including an estimate of the number and type (e.g., students, staff, members of the public) of individuals likely to be affected.
5. An explanation of the mitigation efforts that have been or will be implemented to address the technology's noncompliance, including a plan for providing equivalent services, materials, or information to individual users while the technology remains noncompliant.
6. A plan and timeline for ensuring the technology will become compliant in the future or, if more appropriate, for replacing the technology or providing functionally equivalent alternatives that do comply with relevant accessibility policies and/or standards.

The IT Accessibility Coordinator, in consultation with the responsible vice president and relevant College departments, will evaluate requests for exemptions.

When granted, exemptions will allow provisional use of a covered technology while accessibility testing or remediation efforts are completed. All exemptions will automatically expire after a period of no more than one year.

5. Accessibility Feedback and Complaints

The College will publish on its website guidelines for providing feedback regarding the accessibility of a covered technology. All feedback submitted to the college will be reviewed by an accessibility complaint resolution team composed, at a minimum, of the IT Accessibility Coordinator and/or the Executive Director of Information Technology, the Director of the Center for Disability Services, and the Director of Educational Technology. This team will collectively determine which departments or individuals at the College are best situated to investigate or resolve each complaint.

This feedback and complaint process provides a method for notifying the College of covered technologies that do not currently meet the College's accessibility standards. It does not modify or replace any previously established procedures related to accommodations for individuals with disabilities, formal grievance procedures related to student and employee conduct, or to claims of discrimination resulting from a disability.

DEFINITIONS

"Accessible" refers to the objective that everyone, including those with disabilities, will have integrated and equally effective access to programs and services in as timely a fashion as the original format or medium provides.

"Covered technologies" are information technologies and digital media created, purchased, licensed, or maintained by employees of Everett Community College and used by faculty, staff, students. These include College-operated websites, web applications, software, hardware, electronic documents, and multimedia.

Third-party content encountered by a user after leaving a covered technology is not covered by this policy (e.g., links to external content not created, purchased, or licensed by the College).

“Disability” means physical or mental impairment that substantially limits one or more major life activities.

“Integrated” means that alternate methods or formats for accessing information and media or for using covered technologies are readily available from within the user interface, website, or computing environment.

“Equal access,” “equal opportunity to access,” and “equally effective” all refer to the ability of an individual, with or without a disability, to access the same information or services, in as timely a fashion, as provided by the original format, medium, or technology.

“VPAT” or “Voluntary Product Accessibility Template” is a standardized document describing how computer hardware, software, and online services ensure accessibility under Section 508 of the 1973 Rehabilitation Act. VPATs are commonly used by federal and state agencies when evaluating and procuring information technology products and services.

RELEVANT LAWS AND RELATED INFORMATION

[Americans with Disabilities Act of 1990](#)

Rehabilitation Act of 1973, [Section 504](#) and [Section 508](#)

[RCW 28B.10.912: Students with Disabilities](#)

[RCW 49.60: Discrimination](#)

[Washington OCIO Policy 103](#)

[Washington OCIO Policy 188](#)

[SBCTC Policy 30.20.30: Access for Students with Disabilities](#)

[Web Content Accessibility Guidelines \(WCAG\) 2.0](#)

[EvCC7040: Accessible Technology and Digital Media Policy](#)

REVISION HISTORY

Original Date: May 22, 2018

APPROVED BY

VP Staff