

Online Course Accessibility Policy

Contents

Online Course Accessibility Policy	1
1. Goals	1
2. Scope	2
3. Laws.....	2
4. Definitions	3
5. Online Course Accessibility Subcommittee.....	3
6. Online Course Design Practices for Accessibility	4
7. Disability Services	5
8. Accommodations	6
9. Related CSU Accessibility Guidelines.....	6
10. Procurement.....	6
11. Integrations.....	7
12. Budget.....	7
13. Additional Information	7
References	8

1. Goals

Columbus State University values

- excellence** “commitment to best practice in teaching and learning,”
- engagement** “...participation by students, faculty, and staff in the university experience,” and
- inclusion** “fostering and promoting a campus that embraces diverse people, ideas, views, and practices.”

The Columbus State University (CSU) Center of Online Learning (COOL) upholds these values. COOL serves faculty by supporting online learning in all forms and provides accessibility services including training for building accessible online courses and video captioning.

- a. CSU is committed to supporting accessibility of its CSU online course content to people with disabilities. This is accomplished beginning June 1, 2017 by providing training, captioning services, instructional design support to faculty, and online course content evaluation to ensure accessible course design.

- b. CSU strives to have all online course content accessible to people with disabilities and is guided by World Wide Web Consortium (W3C) Web Content Accessibility Guidelines 2.0 (referred to as WCAG) Level A and Level AA. (See 3-d, 4-c, and [CSU Online Course Accessibility Guidelines Checklist](#)).
- c. In addition, CSU COOL will ensure third-party content providers are aware of our web accessibility policy. Columbus State University will also favor providers based on their accessibility conformance claims.
- d. Existing online course content will be evaluated beginning May 1, 2017 using [CSU Online Course Accessibility Guidelines Checklist](#). Fully online courses will be given priority.
- e. This policy will be reviewed May 1, 2017 –April 30, 2018 on or before May 1, 2018.

2. Scope

CSU based student facing electronic instructional content that is required in a CSU course

3. Laws

Two civil rights laws govern the obligations of postsecondary institutions with respect to the accessibility of digital learning materials and online courses - [Section 504 of the Rehabilitation Act of 1973](#) (Section 504) and the [Americans with Disabilities Act](#) (ADA):

- a. **Americans with disability Act** (ADA) of 1990, Title II - Prohibits discrimination on the basis of disability in all public entities, including public colleges and universities, regardless of whether they receive federal funding. Together with its 2008 amendments, Title II mandates that no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity... public universities must afford individuals with disabilities an equal opportunity to participate in or benefit from any aid, benefit, or service provided to others and are also required to furnish appropriate auxiliary aids and services where necessary to afford qualified individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of its services programs, or activities.
- b. **Section 504 of the Rehabilitation Act** of 1973 prohibits discrimination on the basis of disability in programs and activities that receive federal funding and requires reasonable accommodation for qualified individuals with disabilities
- c. **Section 508 of the Rehabilitation Act** of 1973 requires federal agencies to make their electronic and information technologies available to people with disabilities. Federal agencies...must give... members of the public

access to information that is comparable to access available to others.

- d. **Section 508 Refresh** – reorganizes the Section 508 standards and Section 255 guidelines in response to market trends and innovations. Harmonizes these requirements with the Web Content Accessibility Guidelines (WCAG 2.0). The rule references Level A and Level AA Success Criteria in WCAG 2.0. Compliance is required by January 18, 2018
- e. **Office of Civil Rights FAQ (frequently asked questions) document 2011** – clarified that legal principles ... apply to all faculty and staff of an institution and are applicable in the context of online programs that are provided directly by the school or through contractual or other arrangements.

4. Definitions

- a. Disability - Persons with disabilities **include** those who have **long-term physical, mental, intellectual or sensory impairments** which in interaction **with various barriers** may hinder their full and effective participation in society on an equal basis with others
- b. Accessible - The **ADA Accessibility Guidelines' definition** “any site, building, facility or portion thereof that is approachable and functional can be used independently, safely and with dignity by people with disabilities.” **Office of Civil Rights Functional Definition of Accessibility** “students with disabilities must be provided the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a student without disabilities with substantially equivalent ease of use.”
- c. Accessible ICT (Information and Communication Technology) – An abbreviated [summary of the WCAG 2.0](#) guidelines... ICT content is **perceivable**, provides text alternative for non-text content, captions for multimedia and makes it easier for users to see and hear content, **operable**, provides all functionality from a keyboard, **understandable**, makes text readable, and **robust**, maximizes compatibility with current and future tools.
- d. Universal Design - the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability.
- e. Accommodation - describes making programs, services and facilities accessible and useable by people with disabilities. To accommodate a person with a disability may mean making a modification in the regular program, adapting service delivery, and/or removing barriers in a facility.

5. Online Course Accessibility Subcommittee

The purpose of the Online Course Accessibility Subcommittee is to collaborate in identifying accessibility issues and solutions in online courses

with the goal of proactive accessible design of online courses. The charge of this committee will be to make recommendations to the Distance Learning Committee regarding policy and procedure to ensure the accessibility compliance of online instructional content.

6. Online Course Design Practices for Accessibility

a. Learning Management System

The CSU learning management system Brightspace by Desire2Learn is an accessible learning environment. Brightspace and integrated software applications accessibility policies are available on our website https://cool.columbusstate.edu/accessibility_policies_of-D2L_integrated_software.php A link to the Brightspace accessibility policy is provided on the homepage in each online course.

b. A goal of CSU COOL is that online courses are proactively designed to ensure online content accessibility. The Center of Online learning looks to W3C Web Content Accessibility Guidelines (WCAG) 2.0. Online courses that are in the path of current students who are known to have disabilities are given priority for being brought up to standard. Existing courses are brought up to standard according to goals 1, a-d within this policy.

c. Supplemental Web Sites

When links to external Web sites are provided to students within an online course, the portion of those external sites intended for student viewing should be reviewed for conformance with the guidelines listed above.

d. Supplemental Course documents such as Microsoft Office files, PDF files, and videotapes should conform to the guidelines listed above.

e. Roles and responsibilities

COOL

- Provide captioning services for multimedia to be used in online courses.
- Evaluate accessibility policies and (Voluntary Product Accessibility Template) VPAT for Brightspace integrations.
- Verify that a link to the Brightspace accessibility policy is provided on the Brightspace homepage.
- Provides levels of support for faculty on accessible instructional design based on department chair goals and faculty needs.
 1. Provide training to increase faculty awareness of the needs of persons with disabilities for accessible course design. Provide training on legal requirements for accessible course related ICT, improved user function of accessible course related ICT, and the moral imperative of making online course ICT accessible. Provide training for faculty on characteristics of

accessible design and provide faculty with [CSU Online Course Accessibility Guidelines Checklist](#).

2. Provide training for faculty on use of proactive accessible instructional design and Universal Design for Learning (UDL) including creating accessible content, documents, and multimedia. Provides a review of accessibility of an online course and recommendations for improving accessibility.
3. Provide faculty with a system (form and consultation) for requesting COOL services to review an online course, make recommendations to improve online course content accessibility, and modify their course content to make it compliant with WCAG 2.0 levels A and AA according to the timeline in goals 1, a-d within this policy

Instructor

- As stated in the Faculty Handbook, 2. Academic Responsibilities, a) Syllabus Requirement, “syllabus must include... the university’s policy statement regarding [students with disabilities](#).” As stated in the Faculty Handbook, 3. Faculty Responsibilities to Students, a) Students with Disabilities, “Faculty are expected to make all reasonable accommodations to students with disabilities to allow them the opportunity to succeed in the classroom. For more information about policies and services related to students with disabilities, the [Disability Services](#) website may prove helpful.”
- Include disability statement in syllabus of all online courses that includes a link to the **institutions ADA policy/ guidelines and information on how to access the University’s disabilities support services**. “Students with documented physical, psychological, or cognitive disabilities should contact the Office of Disability Services as early as possible.”
<https://disability.columbusstate.edu/index.php>
- Utilize best practices for designing accessible online courses and content. Apply principles of UDL and proactively design accessible courses.
- Select captioned multimedia when possible.

Institution

- Faculty who are new to online teaching will be required to participate in accessibility training prior to teaching online at CSU or within the first semester as a way to prepare faculty to avoid noncompliance issues.

7. Disability Services

The Office of Disability Services coordinates the compliance of Columbus State University with the Americans with Disabilities Act (ADA) of 1990, P.L. 101-336 (July 26, 1990), as amended by P.L. 110-325 (September 25, 2008)

and Section 504 of the Rehabilitation Act of 1973, not merely to achieve legality, but to foster academic potential through individualized plans tailored to the particular needs of students with disabilities. Students with documented physical, psychological, or cognitive disabilities should contact the Office of Disability Services as early as possible.
<https://disability.columbusstate.edu/index.php>

8. Accommodations

Students with disabilities are not required to self-identify unless they are requesting an academic accommodation. The proactive design of online courses is expected to minimize the need for student accommodations.

9. Related CSU Accessibility Guidelines

The Columbus State University Web Services employs web styles and standards. Website Design Standard 8 addresses accessible design and states:

All CSU Web pages must be accessible to users with disabilities.

a. All pages must link to a text-only version. The templates include code to automatically generate link to text-only versions of web pages.

b. Must be section 508 compliant

c. For more accessibility information see Appendix C.

Appendix C: Accessibility and Compatibility – accessible websites are sites that allow all users, regardless of disability, to access the content of a site. Accessibility compliance insures that users with disabilities who use software other than a regular Web browser are able to “read” the site.

Using AChecker Web Accessibility Tool AChecker will check your site for accessibility compliance for both the Americans with Disabilities Act (ADA) and World Wide Web Consortium (WC3) guidelines. Visit <http://achecker.ca/checker/> to check your site.

508 Compliance Checklist Section 508 requires that all website content be equally accessible to people with disabilities. This applies to Web application, Web pages, and all attached files. It applies to intranet as well as public-facing Web Pages. You can check you site’s 508 Compliance by using [this checklist](#).

10. Procurement

The Center of Online Learning collaborates with the University Information and Technology Services regarding procurement. The accessibility of technology tools, software, and licensing agreements used in an online course should be considered prior to purchasing if possible. Vendors should

be required to provide detailed documentation about the accessibility of their products. Accessibility assurances should be a condition of purchase and should be written into the contract.

11. Integrations

Prior to pilots based on instructor requests, an evaluation of the accessibility of requested tools should be conducted. Only accessible tools will be piloted and/or integrated with Brightspace.

12. Budget

NA- department by department basis

13. Additional Information

GSA Government-wide Section 508 Accessibility Program This site provides information about Section 508 Law and Related Laws and Policies. <https://www.section508.gov/content/learn/laws-and-policies>

Portland Community College Accessibility Resources

This site provides a guide for instructors for making course content accessible [Portland Community College Accessibility for Online Course Content](http://www.pcc.edu/resources/instructional-support/access/)
<http://www.pcc.edu/resources/instructional-support/access/>

University of Washington IT Accessibility Policies

This site provides access the UW accessibility policies and guidelines <http://www.washington.edu/accessibility/policy/>

World Wide Web Consortium (W3C) Web Accessibility initiative (WAI)

W3C WAI develops guidelines widely regarded as the international standards for Web Accessibility. The W3C Web Content Accessibility Guidelines (WCAG) 2.0 can be found at <http://www.w3.org/TR/WCAG20/>. The WCAG 2.0 guidelines make online content more usable for all learners. The guidelines are based on the following four principles that web content is perceivable, operable, understandable, and robust.

References

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<http://udloncampus.cast.org/home#.WNWB3FUrJQI>

<http://universaldesign.ie/What-is-Universal-Design/>

<https://faculty.columbusstate.edu/handbooks/faculty-handbook/rights-privileges-responsibilities.php#b3b>

<https://webs.columbusstate.edu/stylesstandards/appendixc.php>

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<https://www.section508.gov/content/learn/laws-and-policies>

<https://www.w3.org/WAI/WCAG20/glance/>

<https://www.w3.org/WAI/impl/pol>