Baker College

Web Accessibility Policy and Procedure

Last Updated: August 2018

Accessibility of Web Content: Outlined in Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 U.S.C. § 794, and its implementing regulation at 34 C.F.R. Part

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OVERVIEW

Baker College complies with the spirit and requirements of Section 504 of the Rehabilitation Act of 1973 as amended, and the Americans with Disabilities Act of 1990 (ADA), as amended by the Americans with Disabilities Act Amendments Act of 2008 (ADAAA), as they apply to persons with disabilities who are otherwise qualified in the following ways: all new facilities are barrier free; programs, classes, and activities in existing facilities are made accessible to persons with disabilities; reasonable and appropriate adjustments and accommodations are made to ensure full educational opportunity for students with disabilities; and auxiliary aids and services, when necessary, are provided in a timely manner to afford an individual with a disability an equal opportunity to effectively participate in, and enjoy the benefits of, a service, program, course, web accessibility, employment, or activity conducted by the College.

Discrimination based on disability is prohibited by college policy and local and federal laws, including the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990. The college is committed to providing equal educational and employment opportunities for qualified individuals with disabilities.

DEFINITIONS

Web Accessibility:

Accessibility of web content for Title III of the Americans with Disabilities Act, which applies to public accommodation, commercial facilities; or private entity that offers examinations or courses related to applications, licensing, certification, or credentialing for secondary or postsecondary education, professional, or trade purposes. An accessible webpage affords persons with disabilities the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as person without a disability in an equally effective and equally integrated manner, with substantially equivalent ease of use so that they are able to obtain the information as fully, equally, and independently as person without a disability and are provided equal opportunity to the education benefits and opportunities afforded by the technology and equal treatment in the use of such technology.

Web Content:

Web content is anything displayed on a website, including content developed and/or delivered by third-parties, including the code used to construct it. Content is also defined as information being provided through the College's website and displayed on it, including links to outside information that's utilized to convey its program, such content must also be accessible.

Web content excludes computer or mobile devices and/or the web browser that was used to access the content.

Web Content Standards:

Web content will employ accessibility standards outlined by both [Web Content Accessibility Guidelines (WCAG) 2.0](#) and [Web Accessibility Initiative (WAI-ARIA)](#). Both standards address technical requirements and standards to support level AA website accessibility policies and practices.

Web Accessibility Coordinator:

The web accessibility coordinator will have the responsibility, resources and authority to ensure that the web content is accessible and adherences to the web accessibly policies and procedures.

Web Content Accessibility Audit:

Accessibility audit will be conducted annually by a third-party to ensure that the website must generally support Section 504. The audit will identify risks and corrective actions that will be delivered to the web accessibility coordinator.

Web Accessibility Training:

The web accessibility coordinator will develop training materials and conduct annual training sessions for any staff members that create or distribute public (online) materials. This also includes confirmation that any third-party vendors that publishes public online materials observes Baker College's Web Accessibility Policies and Procedures.

Auxiliary Aids:

Auxiliary aids are defined by the [Office for Civil Rights, Section 504](#) , including, but is not limited to the following:

- Closed caption decoders
- Readers and electronic readers
- Videotext displays

Grievance, Section 504:

A formal complaint, specifically for potential violations under Section 504.

Third-party:

External entities that have a relationship or affiliation with Baker College and/or content from non-College sources that support initiatives and/or operations, specifically related to website content.

POLICIES AND PROCEDURES

The policies and procedures identified are to support Web Accessibility requirements as outlined and defined by Office for Civil Rights, Section 504 .

In order to ensure that the website is accessible and conforms with standards, Baker College will employ practices, policies and procedures to support ADA requirements in the following:

Web Content:

Overall the web content must comply with Section 504. Web Content Accessibility Guidelines 2.0 (WCAG 2.0) is a technical standard that will be adopted and leverages (12) twelve guidelines that are organized under (4) four principles and each guideline offers testable success criteria for level AA.

The online content delivered via the website must be inclusive of the standards, which are outlined, below:

Perceivable

- Provide **text alternatives** for non-text content.

- Provide **captions and other alternatives** for multimedia.

- Create content that can be **presented in different ways**,

- including by assistive technologies, without losing meaning.

- Make it easier for users to **see and hear content**.

Operable

- Make all functionality available from a **keyboard**.

- Give users **enough time** to read and use content.

- Do not use content that causes **seizures**.

- Help users **navigate and find content**.

Understandable

- Make text **readable and understandable**.

- Make content appear and operate in **predictable** ways.

Approved on August 30, 2018 to address: Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 U.S.C. § 794, and its implementing regulation at 34 C.F.R. Part 104

Late updated on November 15, 2017 and submitted for approval to Office of Civil Rights, OCR Docket #:15-16-2174

- Help users **avoid and correct mistakes**.

Robust

- Maximize **compatibility** with current and future user tools.

In addition, the college will employ Web Accessibility Initiative (WAI-ARIA) standards, to ensure that scripting, API's, etc. also meets ADA requirements.

Third-Party Accessibility Procedure

To ensure that web content is accessible, Web Accessibility Policies and Procedure will be communicated and shared with third-party vendors.

Web content, although development by a third-party vendor, must adhere to the standards outlined in the web accessibility policies and procedures document. If there is a content development conflict that does not support the standard, either new or modifications/revisions to existing content, the third-party vendor is to notify the web accessibility coordinator, to discussion potential solutions to determine a resolution.

In addition, while conducting our audit and content verification, if any third-party content doesn't comply with those outlined in the Web Accessibility Policies and Procedure, Baker College will contact the third-party and establish a reasonable timeframe, that does not exceed 90-days, to ensure that the content is updated to support ADA compliance.

Content that does not meet ADA standards will not be used until it is fully compliant.

Content Acquisition from Third Parties

Administrators and staff that actively seek web content for use and/or developed by third-parties are required to comply with the Web Accessibility Policies and Procedures. Prior to linking and/or requesting that web content be shared, administrators and staff will need to seek approval from the web accessibilities coordinator (contact information is provided in the Grievance and Due Process section).

If the content does not meet the standards, administrators and staff are to seek resolution by following the Third-Party Accessibility Procedures.

Audit and Content Verification

In order to verify that the website content does in fact meet the standards outlined in the web accessibility policies and procedures document, the web accessibility coordinator will be responsible for employing a third-party vendor to ensure that the site is in compliance with ADA WCAG 2.0 level AA.

The web accessibility coordinator will not utilize the company responsible for developing and maintaining the website or online content but will select an independent vendor on an annual basis.

It's important to note that the web accessibility coordinator will have tools at his/her disposal to periodically test to confirm that content is in compliance, below, are a couple tools that can generate and report findings, including embedding documents such as MS Word or PDF files:

- WAVE accessibility verification
- SortSite website testing and accessibility check

Training

The web accessibility coordinator will conduct training on an annual basis. The training will also be in format that can be accessed independently, outside of the annual training session(s). Training will include, but not be limited to, definition of ADA Compliance, detailed review of the Web Accessibility Policies and Procedure, third-party compliance training, examples of compliant vs. non-compliant content, understanding the grievance process and roles and responsibilities of administrators and staff that seek web content.

The training will target administrators and staff and/or any individual that contributes content to the website.

Annual Report

The web accessibility coordinator is also responsible for publishing and distributing an annual website audit will be conducted in June of each year.   After the audit is finalized, in mid-July a report will be shared with executive leadership and will include the following:

- Identification of ADA compliance matters discovered during the audit.

- Comparative review of technical standards as outlined in the policy and procedure.

- Recommendations for corrective action along with a reasonable due date and cost-estimate.

- History of grievances along with the resolutions, including dates and resolution timeframe.

The report is due to executive leadership in August, at the end of the fiscal year.

Grievance and Due Process:

If any person, student, prospective students, guests, visitors, etc., believes that Baker College has inadequately applied the principles and/or regulations of the Americans with Disabilities Act as it relates to accessibility of online content, please direct concerns, questions and/or grievances to:

Section 504 Grievance, please contact:

Dawn Prueter, Associate Provost and Americans with Disabilities Act Coordinator

Phone: 810-766-4024 and/or 833-691-7867 / Email: dawn.prueter@baker.edu

1050 West Bristol Rd., Flint, MI 48507

Concerns regarding Web Accessibility, please contact:

DaRon Hairston, Web Accessibility Coordinator

Phone: 810-766-8758 / Email: daron.hairston@baker.edu

1050 West Bristol Rd., Flint, MI 48507

Approved on August 30, 2018 to address: Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 U.S.C. § 794, and its implementing regulation at 34 C.F.R. Part 104

Late updated on November 15, 2017 and submitted for approval to Office of Civil Rights, OCR Docket #:15-16-2174