

WEB ACCESSIBILITY ACTION PLAN

Cornwall-Lebanon
School District

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CLSD Statement on Accessibility

The Cornwall-Lebanon School District is committed to providing accessible, usable, and aesthetic design of its web content. The CLSD Web Accessibility Policy defines the accessibility requirements for district web pages and online content. The current guidelines require that pages meet Section 508 and Web Content Accessibility Guidelines 2.0 (WCAG) at conformance level AA.

Web Accessibility Team

Name	Title	Role
Jason Murray	Technology Director	Administrator - Technical
Travis Bensing	Instructional Technology Specialist	Researcher & Trainer
Amy Wissinger	Community Relations Coordinator	Public Relations
Michael Robinson	Director of Secondary Education	Administrator - Communication
Jean Hentz	Assistant Business Director	Administrator - Communication
Sarah Schaeffer	Pupil Services Coordinator	Administrator - 504/ADA Representative
Nicole Malinoski	CCHS Principal	Contributor & Trainer
Mariah Rackley	CCMS Principal	Contributor & Trainer
Nathan Artz	CW Principal	Contributor & Trainer
Dean Bozman	EB Principal	Contributor & Trainer
Barry Ferguson	SL Principal	Contributor & Trainer
Bernard McGinty	UC Principal	Contributor & Trainer

Technology Guidelines & Aspects to Consider

Below is a summary of the guidelines outlined in Section 508 and Web Content Accessibility Guidelines (WCAG) 2.0 and how they will impact the following technology types:

General Web Content

1.1.1 Non-Text Content (Level A): Provide alternative text for all images and other “non-text” items.

1.3.1 Info & Relationships (Level A): Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text.

1.3.2 Meaningful Sequence (Level A): When the sequence in which content is presented affects its meaning, a correct reading sequence can be programmatically determined.

1.3.3 Sensory Characteristics (Level A): Instructions provided for understanding and operating content do not rely solely on sensory characteristics of components such as shape, size, visual location, orientation, or sound.

1.4.1 Use of Color (Level A): Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.

1.4.3 Contrast – Minimum (Level AA): The visual presentation of text and images of text has a contrast ratio of at least 4.5:1, except for the following: Hide full description

- **Large Text:** Large-scale text and images of large-scale text have a contrast ratio of at least 3:1;

- **Incidental:** Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement.
- **Logotypes:** Text that is part of a logo or brand name has no minimum contrast requirement.

1.4.4 Resize Text (Level AA): Except for captions and images of text, text can be resized without assistive technology up to 200 percent without loss of content or functionality.

1.4.5 Images of Text (Level AA): If the technologies being used can achieve the visual presentation, text is used to convey information rather than images of text except for the following: Hide full description

- **Customizable:** The image of text can be visually customized to the user's requirements;
- **Essential:** A particular presentation of text is essential to the information being conveyed.

2.1.1 Keyboard (Level A): All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes, except where the underlying function requires input that depends on the path of the user's movement and not just the endpoints.

2.1.2 No Keyboarding Trap (Level A): If keyboard focus can be moved to a component of the page using a keyboard interface, then focus can be moved away from that component using only a keyboard interface, and, if it requires more than unmodified arrow or tab keys or other standard exit methods, the user is advised of the method for moving focus away.

2.2.1 Timing Adjustable (Level A): For each time limit that is set by the content, at least one of the following is true: Hide full description

- **Turn off:** The user is allowed to turn off the time limit before encountering it; or
- **Adjust:** The user is allowed to adjust the time limit before encountering it over a wide range that is at least ten times the length of the default setting; or
- **Extend:** The user is warned before time expires and given at least 20 seconds to extend the time limit with a simple action (for example, "press the space bar"), and the user is allowed to extend the time limit at least ten times; or
- **Real-time Exception:** The time limit is a required part of a real-time event (for example, an auction), and no alternative to the time limit is possible; or
- **Essential Exception:** The time limit is essential and extending it would invalidate the activity; or
- **20 Hour Exception:** The time limit is longer than 20 hours.

2.2.2 Pause, Stop, Hide (Level A): For moving, blinking, scrolling, or auto-updating information, all of the following are true: Hide full description

- **Moving, blinking, scrolling:** For any moving, blinking or scrolling information that (1) starts automatically, (2) lasts more than five seconds, and (3) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it unless the movement, blinking, or scrolling is part of an activity where it is essential; and
- **Auto-updating:** For any auto-updating information that (1) starts automatically and (2) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or

hide it or to control the frequency of the update unless the auto-updating is part of an activity where it is essential.

2.3.1 Three Flashes or Below Threshold (Level A): Web pages do not contain anything that flashes more than three times in any one second period, or the flash is below the general flash and red flash thresholds.

2.4.1 Bypass Blocks (Level A): A mechanism is available to bypass blocks of content that are repeated on multiple Web pages.

2.4.2 Page Titled (Level A): Web pages have titles that describe topic or purpose.

2.4.3 Focus Order (Level A): If a Web page can be navigated sequentially and the navigation sequences affect meaning or operation, focusable components receive focus in an order that preserves meaning and operability.

2.4.4 Link Purpose (Level A): The purpose of each link can be determined from the link text alone or from the link text together with its programmatically determined link context, except where the purpose of the link would be ambiguous to users in general.

2.4.5 Multiple Ways (Level AA): More than one way is available to locate a Web page within a set of Web pages except where the Web Page is the result of, or a step in, a process.

2.4.6 Headings and Labels (Level AA): Headings and labels describe topic or purpose.

2.4.7 Focus Visible (Level AA): Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible.

3.1.1 Language of Page (Level A): The default human language of each Web page can be programmatically determined.

3.1.2 Language of Parts (Level AA): The human language of each passage or phrase in the content can be programmatically determined except for proper names, technical terms, words of indeterminate language, and words or phrases that have become part of the vernacular of the immediately surrounding text.

3.2.1 On Focus (Level A): When any component receives focus, it does not initiate a change of context.

3.2.2 On Input (Level A): Changing the setting of any user interface component does not automatically cause a change of context unless the user has been advised of the behavior before using the component.

3.2.3 Consistent Navigation (Level AA): Navigational mechanisms that are repeated on multiple Web pages within a set of Web pages occur in the same relative order each time they are repeated, unless the user initiates a change.

3.2.4 Consistent Identification (Level AA): Components that have the same functionality within a set of Web pages are identified consistently.

3.3.1 Error Identification (Level A): If an input error is automatically detected, the item that is in error is identified and the error is described to the user in text.

3.3.2 Labels or Instructions (Level A): Labels or instructions are provided when content requires user input.

3.3.3 Error Suggestions (Level AA): If an input error is automatically detected and suggestions for correction are known, then the suggestions are provided to the user, unless it would jeopardize the security or purpose of the content.

3.3.4 Error Prevention – Legal, Financial, Data (Level AA): For Web pages that cause legal commitments or financial transactions for the user to occur, that modify or delete user-controllable data in data storage systems, or that submit user test responses, at least one of the following is true: Hide full description

1. **Reversible:** Submissions are reversible.
2. **Checked:** Data entered by the user is checked for input errors and the user is provided an opportunity to correct them.
3. **Confirmed:** A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission.

4.1.1 Parsing (Level A): In content implemented using markup languages, elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique, except where the specifications allow these features.

4.1.2 Name, Row, Value (Level A): For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies.

Online Video & Audio

Prerecorded

- **1.2.1 Audio-Only and Video-Only** (Level A): Provide an alternative (text transcript) for audio-only. Provide either an alternative media or audio track for video-only (no sound).
- **1.2.2 Captions** (Level A): Provide captions for all prerecorded video hosted on the web.
- **1.2.5 Audio Description** (Level AA): Provide audio description for all prerecorded video content in synchronized media.
- **1.4.2 Audio Control** (Level A): If any audio on a Web page plays automatically for more than 3 seconds, either a mechanism is available to pause or stop the audio, or a mechanism is available to control audio volume independently from the overall system volume level.

Live

- **1.2.4 Captions** (Live) (Level AA): Provide captions for all live audio content in synchronized media.

Process & Training

Process

Technology Services will communicate all necessary information to all necessary faculty and staff members. Communication about Web Accessibility will take many forms, including, email messages, Q&A sessions at faculty meetings, flyers, and information posted on the ITS Website. Administrators and Department Chairpersons will be expected to monitor and communicate district expectations to faculty and staff members.

Core sites and pages will be scanned regularly for potential accessibility issues. Other accessibility issues that are seen can be reported to Technology Services. The accessibility issue will be addressed in a timely manner and a remediation process will be completed for necessary faculty or staff members.

Training

Accessibility training for faculty and staff will include hands-on workshops, online coursework, and one-on-one consulting with Technology Services. Training materials will be developed through Technology Services and other online resources for web accessibility.

Technology Aspects for Consideration

New Content

The CLSD will train faculty and staff members who are responsible for the content creation to follow best practices for web design. Lead faculty and staff will be identified and will attend training sessions provided through Technology Services.

New websites, pages, and web content will be created using standardized design frameworks, templates, and protocols that meet the current WCAG 2.0 AA guidelines.

All future purchases or subscriptions of web content will require a statement from the company that guarantees compliance with Section 508 and WCAG 2.0 AA guidelines.

Existing Content

The CLSD will review current web content. Content that is not found to be compliant will be updated to meet Section 508 and WCAG 2.0 AA guidelines or will be archived and removed from use on the web.

Existing outsourced content will be reviewed for web accessibility. All content providers will be asked to provide a statement of compliance with Section 508 and WCAG 2.0 guidelines.

Strategic Planning

Ten Year Strategic Plan

Year 1 (Academic Year 2017-2018)

- Summer 2017
 - Begin planning for web accessibility compliance
 - Evaluate current district website.
 - Redesign district website.
 - Rebuild and populate the new district website
 - (purchase subscription through BlackBoard SchoolWires)
- Fall/Winter 2017
 - Train key tech department members at Web Accessibility Training through IU-13
 - Create web accessibility team.
 - Inform team members of web accessibility issues and guidelines.
 - Finalize web accessibility plan.
 - Assess current accessibility for all web content.
- Spring 2018

- Create training materials to share with faculty and staff.
- Gather and inventory resources.
- Develop a checklist of tasks.
- Prioritize checklist.
- Delegate tasks.
- Begin changes making changes to content to meet Section 508 and WCAG 2.0 guidelines.

Year 2 (Academic Year 2018-2019)

Create infrastructure to identify and promote accessibility needs, identify most at-risk resources, and begin active interventions. Types of activities might include:

- Creating trainings on accessible documents (PDF, DOCX, etc.).
- Communicating accessibility expectations to staff.
- Creating an accessibility network: Identify liaisons, connections, and resources.
- Identifying and building infrastructure components to foster accessibility attitudes and initiatives.
- Beginning a regular communications website and application accessibility review cycle and enhance website headers, footers and navigation tools for accessibility.
- Evaluate a new learning management system more compatible to the district's accessibility initiative.

Year 3 (Academic Year 2019-2020)

Continue to address improved accessibility in high risk assets, develop interventions to impact a wider range of accessibility issues and begin evaluation of interventions. Types of activities might include:

- Quantifying percentage of accessible content specifically syllabi in learning management system.
- Fostering an accessibility network.
- Creating accessibility training on additional file types (e.g., PowerPoint).
- Cataloging content in learning management system courses and identify areas for remediation.
- Reviewing and enhancing content of top 10 percent highest traffic, communications-based websites and applications.

Year 4 (Academic Year 2021-2022)

Continue to address improved accessibility in high risk assets, develop interventions to impact a wider range of accessibility issues and begin evaluation of interventions. Types of activities might include:

- Quantifying percentage of accessible content specifically assessments and core content in learning management system.
- Fostering an accessibility network.
- Creating accessibility training on additional file types (e.g., Video).
- Cataloging content in learning management system courses and identify areas for remediation.
- Reviewing and enhancing content of top 20 percent highest traffic, communications-based websites and applications.

Year 5 (Academic Year 2022-2023)

Begin identifying accessibility needs of medium risk assets and iterative design of interventions based on evaluation data. Types of activities might include:

- Collecting data on quantity and quality of accessible documents (e.g., PowerPoints, text and pdfs).
- Evaluating accessibility of content in courses and websites.
- Creating training on accessible multimedia.
- Reviewing and enhancing content of top 30 percent of highest traffic, communications-based websites and applications.

Year 6 (Academic Year 2023-2024)

Continue identifying accessibility needs of medium risk assets and iterative design of interventions based on evaluation data. Types of activities might include:

- Collecting data on quantity and quality of accessible documents (e.g., PowerPoints, text and pdfs).
- Evaluating accessibility of content in courses and websites.
- Creating training on accessible multimedia.
- Reviewing and enhancing content of top 40 percent of highest traffic, communications-based websites and applications.

Year 7 (Academic Year 2024-2025)

Begin identifying accessibility needs of medium to low risk assets and iterative design of interventions based on evaluation data. Types of activities might include:

- Collecting data on quantity and quality of accessible documents (e.g., PowerPoints, text and pdfs).
- Evaluating accessibility of content in courses and websites.
- Reviewing and enhancing content of top 50 percent of highest traffic, communications-based websites and applications.

Year 8 (Academic Year 2025-2026)

Extend accessibility remediation to low risk courses, continue iterative design of interventions based on evaluation data and re-evaluate accessibility reporting mechanisms and sustainability measures. Types of activities might include:

- Collecting data on quantity and quality of accessible multimedia.
- Extending staff who are exposed to accessibility training.
- Placing infrastructure and feedback mechanisms in place for iterative course design for accessibility.

- Reviewing and enhancing content of top 60 percent of highest traffic, communications-based websites and applications.

Year 9 (Academic Year 2026-2027)

Continue to extend accessibility remediation to low risk courses, continue iterative design of interventions based on evaluation data and re-evaluate accessibility reporting mechanisms and sustainability measures. Types of activities might include:

- Collecting data on quantity and quality of accessible multimedia.
- Extending staff who are exposed to accessibility training.
- Placing infrastructure and feedback mechanisms in place for iterative course design for accessibility.
- Reviewing and enhancing content of top 70 percent of highest traffic, communications-based websites and applications.

Year 10 (Academic Year 2027-2028)

Evaluate overall accessibility of the district's digital resources and develop new 10 year plan. Types of activities might include:

- Examining accessibility of curriculum and course material.
- Evaluating infrastructure and course content for accessibility.
- Developing future directions for accessibility with stakeholders.

Annual Self-Review

In support of the district's commitment to digital accessibility and progressing the work of each school under their web accessibility 10 year plan, each school is required to submit an Annual Self-Review.

Annual Self-Reviews allow the district to assess our institutional progress and offer an opportunity for schools to report changes in resource commitments, priorities, or approach over the course of the year.

Consultation and support for the 10 year plan and Annual Self-Reviews is provided by the district's technology services.

Purchasing Workflow

EIT Purchasing Process

Those involved in purchasing Electronic Information Technology (EIT) for the district should consider the accessibility of such products or services. Everyone should understand the impact that EIT purchasing and decision-making has on individuals with disabilities in and outside the district.

Include Accessibility Policy Language

Ensure that the following accessibility language is contained in vendor contracts and requests for proposals:

EIT Accessibility. District is committed to providing an accessible, usable, and integrated experience for all people. Electronic and information technology (“EIT”) is information technology and any equipment or interconnected system or subsystem of equipment that is used in the creation, conversion, or duplication of data or information. The term electronic and information technology includes, but is not limited to, telecommunications products, information kiosks and transaction machines, Internet and Intranet websites, web-delivered content, software, electronic books and electronic book reading systems, search engines and databases, multimedia, classroom technology, and office equipment.

Seller warrants that (i) Web-based EIT products provided under this Agreement conform to WCAG 2.0 AA and (ii) non-web-based EIT meets or exceeds the applicable accessibility requirements of section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794d), and its implementing regulations set forth at Title 36, Code of Federal Regulations, Part 1194. Seller agrees to indemnify and hold harmless district from any claims arising out of its failure to comply with the foregoing accessibility standards.

Seller agrees to provide evidence of compliance with these requirements before this Agreement becomes effective and any other time upon reasonable request of the district. In the event EIT provided under this Agreement does not fully conform to the standards set forth above, Seller will promptly advise district in writing of the nonconformance and provide detailed information regarding the plans to achieve conformance, including but not limited to an intended timeline. Seller agrees to promptly respond to and resolve any complaint regarding accessibility of its products or services. Failure to comply with these accessibility standards shall constitute a breach of this Agreement.

Analysis

Where EIT is not fully accessible, an analysis will be conducted by technology services. The analysis will include a determination as to the level of accessibility as well as how it can be provided to all in an equally effective and integrated manner.

Ask Vendor Questions

Some of the questions the purchaser may ask include:

1. Is the technology actually accessible or is there a plan to make it accessible, and if so, what is the time frame?
2. Has the vendor supplied a name and contact information for a person in their company who handles accessibility issues?
3. Was the vendor responsive regarding any accessibility issues discovered by the district?
4. Did the vendor supply a Voluntary Product Accessibility Template (VPAT)?
5. Have the VPAT claims been verified?
6. Has the vendor agreed or indicated willingness to agree to correct identified accessibility issues in an appropriate, mutually agreed upon, time frame?
7. Has the vendor signed the EIT terms addendum?
8. Has the purchaser signed the EIT Accessibility Acknowledgement Form?

Evaluation

In some cases, technology services may determine that further accessibility testing is necessary. Technology services may refer the matter to the Usability/Accessibility Research and Consulting for such evaluation.

The determination will be made as to whether:

1. The purchase should move forward.
2. The purchase should move forward, but only with certain criteria in place.
3. The purchase should not move forward.