

WEB ACCESSIBILITY AND ACCREDITATION

A Blueprint for Regional Agencies

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Provided by:



Gaining **O**nline **A**ccessible **L**earning through **S**elf-Study

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Project GOALS (Gaining Online Accessible Learning through Self-Study) began as a U.S. Department of Education, FIPSE funded, effort to assist postsecondary administrators and institutional leaders in understanding the importance of web accessibility for individuals with disabilities and to act on that awareness. Over time the GOALS work included blueprints useful for both institutions and regional accreditation entities. Begun in 2007, it is led by the National Center on Disability and Access to Education (NCDAE) at Utah State University's (USU) Center for Persons with Disabilities (CPD). Project GOALS works from multiple perspectives of a national consortium. With NCDAE as the lead, this consortium has included the Kentucky Council on Postsecondary Education (CPE), Michigan Community College Virtual Learning Collaborative (MCCVLA), Southern Association of Colleges and Schools - Commission on Colleges (SACSCOC), the Southern Region Education Board (SREB), Web Accessibility in Mind (WebAIM), and the Western Interstate Commission for Higher Education (WICHE).




SACSCOC



UtahStateUniversity
CENTER FOR PERSONS WITH DISABILITIES

SREB

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Without institutional participation and feedback, the GOALS project could not have developed the tools and processes that are at the heart of an institutional self study for web accessibility.

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INTRODUCTION

Sensitive is not usually a word ascribed to accreditors; however, since working with Project GOALS, I have become much more sensitive to the need to provide access to documents in a format that will allow individuals with disabilities the opportunity to find information easily. Having worked in higher education for 40 years and now working with institutions of higher education who enroll students with a variety of learning styles and who are required to ensure that they have access to support materials, official institutional documents, etc., accreditors also have a responsibility to assist institutions in ensuring information in all forms is accessible to all.

Project GOALS, a FIPSE funded grant program, has developed guidelines and templates for accreditors and institutions to use to ensure that all documents, especially those in electronic format, are available to individuals with visual and auditory disabilities. Having the responsibility to comply with federal laws in these matters is one thing, but knowing how to respond adequately to these requirements is another. The materials from Project GOALS have gone a long way in taking the guess work out of how to comply. The materials are easy to understand and implement and I highly recommend that you consider their use within your own organization.

Dr. Belle Wheelan – President, SACSCOC

The Need for Web Accessibility

The Internet is as integral to today's higher education as teachers or textbooks. Students, faculty, and staff alike must have access to institutional web content for essential activities such as registration, applying for financial aid, completing assignments, employment, testing, and delivering or augmenting courses. However, if websites that provide necessary information or services are not accessible, those with disabilities may not be able to independently complete their daily tasks or compete with their peers in academia and beyond. Technology poses the greatest promise for those with disabilities, as long as it is ready for them when they come, and not an additional barrier to their achievement.

While advocates for web accessibility have been actively promoting the need for web accessibility since the early 90's, web content in education remains largely inaccessible. This continuing inequity has resulted in a growing number of lawsuits and complaints. Furthermore, legislation is starting to catch up with technology making accessibility an issue that can no longer be ignored.

“Technology poses the greatest promise for those with disabilities, as long as it is ready for them when they come...”

Providing an inclusive and supportive environment for teaching and learning is a critical part of postsecondary education and a central tenet of the accreditation philosophy. Therefore, accreditors

may want to consider how they can support and encourage institutions and ensure digital materials and institutional web content is accessible to all.

About the Blueprint

In 2010, Project GOALS received a FIPSE grant which, in part, focused on aligning institutional web accessibility with regional accreditation. GOALS, along with consortium partner SACSCOC, worked to identify ways in which web accessibility is, or could be, expressed in regional accreditation materials. The result was a set of materials that can be used by regional accreditors to inculcate web accessibility into their documents and processes, assist review committees in assessing institutional web accessibility, and aid them in providing support for their constituents.

This blueprint contains examples of language and materials that were developed for SACSCOC. While not all of the materials were adopted by the commission, they present options and examples that can be used by other accreditors when looking at their own documents and processes. Whenever possible, these materials have been revised to be non-agency specific – please feel free to use and adapt them as you see fit.

Incorporating Web Accessibility into Accreditation Documents

This document has been developed to serve as a blueprint that can be used by regional accreditation commissions that wish to incorporate web accessibility into their systems or provide support for their constituent institutions.

MAPPING ACCESSIBILITY ONTO EXISTING ACCREDITATION STANDARDS AND CRITERIA

Our first step in the process was to review the *Principles of Accreditation: Foundations for Quality Enhancement* published by SACSCOC. This evaluation was extended to include the published standards and criteria of all the regional accreditors. Several themes, common to all agencies, emerged that were conducive to web accessibility. Essentially, we found that the foundation for web accessibility is already present in the existing guidelines of all the regional accreditation agencies. This means accreditors do not need to make significant changes to indicate the importance of web accessibility in their resource materials. Institutions engaging in system-wide web accessibility can use this information as a guide to help leverage their work on accessibility as they prepare for the reaffirmation process.

To see themes that support web accessibility present in the standards and criteria across all regional accreditation bodies view the ***Mapping Document [Appendix A]***.

Visit ncdae.org/goals/accreditation/accreditation_blueprint.php to view an online version of this document, with links to the Appendix Documents.

OTHER AGENCY DOCUMENTATION

Next, the GOALS team reviewed the resources and publications available on the SACSCOC website. Several resources and publications were identified as potential venues for the inclusion of web accessibility. A number of opportunities for stand-alone documents specifically devoted to web accessibility were also identified. These resources have analog documents across most agencies, so a similar review of resources will help identify potential opportunities for the agency to use language that specifies inclusion of web accessibility overtly, or through example.

Diversity Statement

A diversity statement reinforces an agency's commitment to equality and fairness for all. Specifically including those with disabilities in your diversity statement sets the stage for inclusion elsewhere.

View [*sample language for a diversity statement \[Appendix B\]*](#)

“Specifically including those with disabilities in your diversity statement sets the stage for inclusion elsewhere.”

Position Statement on Web Accessibility

A position statement on web accessibility can be added to an agency's documentation at any time. As a stand-alone document, it allows the agency to alert their constituents about web accessibility without having to wait until core documents are revised.

View a [*sample Position Statement \[Appendix C\]*](#)

Changes to Standards, Principles, and Criteria

The statutes and guidelines required for reaffirmation are the agency's cannon. While adding web accessibility as a specific regulation would be ideal, we recognize the difficulty in making substantive changes to this core document. However, as discussed in the mapping document, the basis for web accessibility already exists across a number of areas within each document. Full inclusion can be endorsed by adding and emphasizing “for all students” in strategic areas such as technology and student services, or by making it clear in the introduction that each standard is intended for everyone, including traditionally underrepresented groups and persons with disabilities.

Statements for Resource Documents and Clarification Materials

A review of agency documentation will likely reveal a wide range of potential areas where accessibility language may be added. Resource documents and clarification materials are ideal locales. The amount of available space and the focus of the document will impact what language is used. GOALS has provided some sample language to get you started. Samples of one sentence, one paragraph, and half page statements are provided.

View [*Sample Statements \[Appendix D\]*](#)

Supporting Web Accessibility Efforts as Part of Reaffirmation

Once web accessibility has been incorporated into agency documents, you will need to provide support and guidance for your constituent institutions to help them understand and engage in web accessibility work during reaffirmation. This was the next series of steps as GOALS worked to support SACSCOC efforts.

Institutional efforts on web accessibility can (and should) be reflected in reaffirmation portfolios. To this end, GOALS has developed materials designed specifically to assist institutions in presenting evidence of accessibility work during reaffirmation.

AN ANALYSIS OF SACSCOC QUALITY ENHANCEMENT PLANS

A quality improvement plan is a universal aspect in the accreditation process. GOALS staff conducted a thematic analysis of 160 Quality Enhancement Plans (QEP's) for project partner SACSCOC's constituent institutions over a two year period. After analysis, staff found these plans can serve as an additional point of congruence with web accessibility work. While quality improvement work generally focuses on student outcomes, the inclusion of all students (including students with disabilities) can serve as one component in a wide range of different plans (e.g., focus on diversity, student learning outcomes, technology use, the freshman experience).

View the blog post ***Accredibility: Using Your Web Accessibility Efforts As Evidence During Reaffirmation [Appendix E]***

BEST PRACTICES FOR INSTITUTION-WIDE WEB ACCESSIBILITY

Staff from GOALS created a Best Practices document to focus institutional efforts. Web accessibility is a complex proposition. GOALS has established a set of Best Practice guidelines outlining the items necessary to achieve institutional web accessibility. These guidelines consist of four *Indicators*, each focusing on an essential aspect of institution-wide web accessibility. These Indicators are comprised of several *Benchmarks*. The strength of each Benchmark lies in the institutional *evidence* for that specific benchmark. This document can serve as a roadmap for institutions to engage in web accessibility work.

View the ***Best Practices for Institution-Wide Web Accessibility [Appendix F]***

“Web accessibility is a complex proposition. GOALS has established a set of Best Practice guidelines outlining the items necessary to achieve institutional web accessibility.”

TEMPLATES FOR INSTITUTIONAL WEB ACCESSIBILITY ACTIVITIES (AND EXAMPLES FOR A REAFFIRMATION PORTFOLIO)

There is no universal format for institutions to present evidence during reaffirmation. Institutions who wish to document their web accessibility efforts as part of continuous improvement or reaffirmation may benefit from a framework that can be used to organize and present evidence of web accessibility efforts.

GOALS staff created a template that can be used in conjunction with the Best Practices Document to help provide a structure for reaffirmation reports or quality improvement outlines. Examples of different ways the template can be used are also provided.

View the [Template](#) and [Examples \[Appendix G\]](#)

“Institutions who wish to document their web accessibility efforts...may benefit from a framework to organize and present evidence of web accessibility efforts.”

OTHER RESOURCES FOR INSTITUTIONS

GOALS staff created a variety of web accessibility resources for institutions along with an online Benchmarking and Planning Tool. Your agency could use these same resources to assist your constituents as they develop an institutional self-study schema or to support them as they plan for, implement, and assess web accessibility across their institution.

View the resources available at ncdae.org/GOALS.

Assisting Review Teams and Accreditation Staff

Assessing the quality of institutional web accessibility for an accreditation portfolio can be a complex issue. It can be especially challenging when those reviewing materials for quality are not familiar with the topic. To assist agencies as they review portfolios that include work on web accessibility, Project GOALS created a set of resources accreditors can use to help inform their reviewers.

EDUCATING ACCREDITORS ABOUT WEB ACCESSIBILITY

An initial resource for reviewers is an article written about the need for web accessibility in higher education. It provides important context for its inclusion in the reaffirmation process. Since web accessibility is an issue that is likely unfamiliar to many in the accreditation field, it is important they understand how it relates to reaffirmation. This is necessary if review teams are expected to evaluate accessibility efforts.

View the article [Accreditation and Web Accessibility: Why Should Accreditors Care? \[Appendix H\]](#)

REVIEWER GUIDANCE DOCUMENT

Project GOALS also created a set of resources to be used by review teams and institutions to help them determine the quality of evidence related to web accessibility.

Getting Started

The guidance documents start with a *Guide to Using GOALS Materials to Evaluate Web Accessibility Evidence during an Accreditation Review*. This document is an overview of the resource materials created for accreditation staff and offers guidance on how to use them.

View the ***Guide to Using GOALS Materials to Evaluate Web Accessibility Evidence During an Accreditation Review [Appendix I]***

Navigating the Guidance Document

To assist reviewers in finding the applicable evaluation support within the Guideline document, GOALS presents an Evidence Evaluation Matrix. The matrix lists common areas or aspects of accessibility with links to the appropriate sections of the Guidance Document that relate to the evidence at hand.

View the ***Evidence Evaluation Matrix [Appendix J]***

Guidelines for Evaluating Web Accessibility Evidence

The Guidelines for Evaluating Institutional Evidence of Web Accessibility is the core resource intended to assist review teams in evaluating web accessibility evidence. These guidelines are based on (and follow the structure of) the Best Practices document described above. For each benchmark found in the indicators of best practice, this resource lists potential evidence, and guidelines for determining the quality of that evidence. It guides reviewers on those things that would support, or call into question, institutional statements of effort.

View the ***Guidelines for Evaluating Institutional Evidence of Web Accessibility [Appendix K]***

Conclusion

The basis for inclusion of web accessibility already exists in the spirit and substance of the accreditation philosophy. Accessibility efforts help institutions better serve their students, faculty, and staff and speak directly to the mission statements and values of both the institution and the accreditors. Furthermore, institutional accessibility efforts can serve as value-added evidence of quality, diversity, and institutional values that may be used in the reaffirmation process.

As awareness grows and legislation shifts toward mandating digital rights, accreditors are in an exceptional position to provide support and guidance to their constituent institutions. This blueprint can assist accreditors in integrating web accessibility into the words and actions of their agencies. Project GOALS has resources for both the institution and accreditation agencies and would like to help. For more information, contact GOALS.

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MAPPING ACCESSIBILITY ONTO EXISTING ACCREDITATION STANDARDS AND CRITERIA

Promoting system-wide web accessibility through the accreditation process does not necessarily mean that new standards or criteria are required. The foundation for web accessibility is already present in the existing guidelines of the regional accreditation agencies. An analysis of the Principles, Standards and Criteria of the six regional accreditors that oversee higher education in the United States revealed multiple areas of support for including web accessibility as part of the accreditation evaluation. The following is a listing of the regional accreditors and the documents reviewed:

- » Middle States Association of Colleges and Schools - Commission on Higher Education (MSC)- 12th Edition <http://www.msche.org/>
- » New England Association of Schools and Colleges - Commission on Institutions of Higher Education (NEASC) - Effective 7/1/11 <http://www.neasc.org>
- » North Central Association of Colleges and Schools - Higher Learning Commission (HLC) - From website 9/27/11 <http://www.ncahigherlearningcommission.org>
- » Northwest Commission on Colleges and Universities (NWCCU) - Revised 2010 <http://www.nwccu.org>
- » Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) - 5th Edition <http://www.sacscoc.org/>
- » Western Association of Schools and Colleges- Accrediting Commission for Senior Colleges and Universities (WASC) - July 2008 Edition <http://www.wascsenior.org>

While there is no single method for inculcating web accessibility into the accreditation process, the first step is to review the standards or criteria with an eye to accessibility positive language. This review can be done by reviewing how accessibility maps onto the principles in the order they appear in the principles document or by focusing on specific themes.

The following are some common themes that lend themselves to the inclusion of web accessibility along with selected examples from the regional accrediting agencies. Please keep in mind that this list is only an example of potential themes and individual institutions and agencies will want to develop themes that are personalized to their specific mission and needs.

Theme: Institutional Mission

Most accreditation bodies have a standard or criterion for an institution's mission and goals. Within these criteria, identifying and supporting their constituents and student bodies is a common element.

In 2008, Project GOALS conducted an evaluation of 100 Higher Education Institutions (two from each state). Of those 100 institutions, all of whom had their Mission Statements available online, 86 used language that would support a web accessibility policy. While the language varied, the implication was clear; diversity and attention to all students' needs are stated primary goals of these institutions.

NEASC - 1.1 The mission of the institution defines its distinctive character, addresses the needs of

society and identifies the students the institution seeks to serve, and reflects both the institution's traditions and its vision for the future. The institution's mission provides the basis upon which the institution identifies its priorities, plans its future and evaluates its endeavors; it provides a basis for the evaluation of the institution against the Commission's Standards.

NEASC - 6.10 The institution systematically identifies the characteristics and learning needs of its student population and then makes provision for responding to them. The institution's student services are guided by a philosophy that reflects the institution's mission and special character, is circulated widely and reviewed periodically, and provides the basis on which services to students can be evaluated.

HLC - Core Component 1b In its mission documents, the organization recognizes the diversity of its learners, other constituencies, and the greater society it serves.

WASC - Standard 1 Defining Institutional Purposes and Ensuring Educational Objectives The institution defines its purposes and establishes educational objectives aligned with its purposes and character. It has a clear and conscious sense of its essential values and character, its distinctive elements, its place in the higher education community, and its relationship to society at large. Through its purposes and educational objectives, the institution dedicates itself to higher learning, the search for truth, and the dissemination of knowledge. The institution functions with integrity and autonomy.

Theme: Strategic Planning

An institution must be sustainable in order to survive. If a university does not have a strategic plan for the future, it will not be able to keep up with the quickly changing face of education. This is especially true for the technologies which are advancing at an exponential rate. The internet, for example has evolved toward a more stringent adherence to standards. However, many of these standards also help to make the web more accessible, not only to persons with disabilities but also to a growing constituent of students and faculty who employ mobile technologies as educational tools. Incorporation of W3C and WCAG standards into an institution's strategic planning can help them stay relevant in an evolving technological world.

As technology evolves, so do the laws surrounding it, Institutions must remain abreast of the changes in store for accessibility in education. When planning for the future, many institutions will find that it is far more economical to plan for web accessibility than to face lawsuits and damages on top of finding themselves having to reengineer websites for accessibility after the fact.

NEASC - 2.3 The institution plans beyond a short-term horizon, including strategic planning that involves realistic analyses of internal and external opportunities and constraints. It plans for and responds to financial and other contingencies, establishes feasible priorities, and develops a realistic course of action to achieve identified objectives. Institutional decision-making, particularly the allocation of resources, is consistent with planning priorities.

HLC - Core Component 2a The organization realistically prepares for a future shaped by multiple societal and economic trends.

WASC - 4.2 Planning processes at the institution define and, to the extent possible, align academic, personnel, fiscal, physical, and technological needs with the strategic objectives and priorities of the institution.

WASC - 4.6 Leadership at all levels is committed to improvement based on the results of the inquiry, evaluation and assessment that is used throughout the institution. The faculty takes responsibility for evaluating the effectiveness of the teaching and learning process and uses the results for improvement. Assessments of the campus environment in support of academic and co-curricular objectives are also undertaken and used.

Theme: Quality

A central tenant of a quality education is quality. However, it is not enough that the information be good, it also must be presented in a way that students can access and understand. Universally designed materials provide value added quality to education. Just as curb cuts in sidewalks help mothers in strollers, people pulling suitcases and others besides persons with disabilities, accessibly designed materials provide benefits for a wide variety of students. Multi-modal presentations allow students with different learning styles to learn in their preferred methods, captions allow students for whom English is a second language to enhance comprehension of materials, and alt tags and descriptions provide improved information for students with older computers.

Natively accessible materials also enhance the quality of the overall educational experience for students with disabilities, allowing them to be full and active participants in any course which has an online component.

NEASC - 4.3 Each educational program demonstrates coherence through its goals, structure, and content; policies and procedures for admission and retention; instructional methods and procedures; and the nature, quality, and extent of student learning and achievement. The institution offering multiple academic programs ensures that all programs meet or exceed the basic quality standards of the institution and that there is a reasonable consistency in quality among them. The institution provides sufficient resources to sustain and improve its academic programs.

NEASC - 4.55 The institution's principal evaluation focus is the quality, integrity, and effectiveness of its academic programs. Evaluation endeavors and systematic assessment are demonstrably effective in the improvement of academic offerings and student learning.

HLC - Core Component 3b The organization values and supports effective teaching.

NWCCU - 2.D.1 Consistent with the nature of its educational programs and methods of delivery, the institution creates effective learning environments with appropriate programs and services to support student learning needs.

SACSCOC - 3.4.5 The institution publishes academic policies that adhere to principles of good educational practice. These policies are disseminated to students, faculty, and other interested parties through publications that accurately represent the programs and services of the institution. (Academic policies)

Theme: Technology

Through technology, universal design provides students with disabilities equitable access to learning. It can also provide enhanced learning for other groups such as those for whom English is a second language, prefer multi-modal learning or who are working on older equipment.

NEASC - 4.7 The institution ensures that students use information resources and information technology as an integral part of their education. The institution provides appropriate orientation and training for use of these resources, as well as instruction and support in information literacy and information technology appropriate to the degree level and field of study. (See also 7.10)

WASC - 3.7 The institution's information technology resources are sufficiently coordinated and supported to fulfill its educational purposes and to provide key academic and administrative functions.

SACSCOC - 3.4.12 The institution's use of technology enhances student learning and is appropriate for meeting the objectives of its programs. Students have access to and training in the use of technology. (Technology use)

Theme: Library and Information Resources

The old notion of the staid librarian lost in the Dewey decimal system has changed. The technological revolution has required university librarians to become experts in digital media and electronic resources as well as the traditional book and paper mediums. Today's libraries must provide access to all students regardless of location, technology medium, or disability.

NEASC - 4.31 The institution offers required and elective courses as described in publicly available print and electronic formats with sufficient availability to provide students with the opportunity to graduate within the published program length.

NEASC - 7.7 The institution ensures appropriate access to library and information resources and services for all students regardless of program location or mode of delivery.

NEASC 7.8 The institution ensures that students have available and are appropriately directed to sources of information appropriate to support and enrich their academic work.

NEASC - 7.9 The institution demonstrates that students use information resources and technology as an integral part of their education, attaining levels of proficiency appropriate to their degree and subject or professional field of study.

NEASC - 8.6 The institution's physical and electronic environments provide an atmosphere conducive to study and research.

MSC - Standard 3: Institutional Resources The human, financial, technical, facilities, and other resources necessary to achieve an institution's mission and goals are available and accessible. In the context of the institution's mission, the effective and efficient uses of the institution's resources are analyzed as part of ongoing outcomes assessment.

NWCCU - 2.A.13 Policies regarding access to and use of library and information resources- regardless of format, location, and delivery method- are documented, published, and enforced.

NWCCU - 2.E.1 Consistent with its mission and core themes, the institution holds or provides access to library and information resources with an appropriate level of currency, depth, and breadth to support the institution's mission, core themes, programs, and services, wherever offered and however delivered.

NWCCU - 2.E.3 Consistent with its mission and core themes, the institution provides appropriate instruction and support for students, faculty, staff, administrators, and others (as appropriate) to enhance their efficiency and effectiveness in obtaining, evaluating, and using library and information resources that support its programs and services, wherever offered and however delivered.

WASC - 3.6 The institution holds, or provides access to, information resources sufficient in scope, quality, currency, and kind to support its academic offerings and the scholarship of its members. These information resources, services and facilities are consistent with the institution's educational objectives and are aligned with student learning outcomes. For both on-campus students and students enrolled at a distance, physical and information resources, services, and information technology facilities are sufficient in scope and kind to support and maintain the level and kind of education offered.

SACSCOC - 2.9 The institution, through ownership or formal arrangements or agreements, provides and supports student and faculty access and user privileges to adequate library collections and services and to other learning/information resources consistent with the degrees offered. Collections, resources, and services are sufficient to support all its educational, research, and public service programs. (Learning Resources and Services)

Theme: Distance Education

Distance education is growing at an accelerated rate. The number of students taking online courses is currently estimated at over 12 million and is expected to rise to over 22 million by 2014 (Nagel, 2009). Distance education can be of great value to students with disabilities, allowing them a measure of freedom and independence that was unavailable to them in the past. However, in order to take advantage of Distance Education, the materials must be made accessible. An inaccessible website not only negates a student's independence, it can also make it impossible for the student to participate in higher education.

NEASC - 4.40 Courses and programs offered for credit off campus, through distance or correspondence education, or through continuing education, evening or week-end divisions are consistent with the educational objectives of the institution. Such activities are integral parts of the institution and maintain the same academic standards as courses and programs offered on campus. They receive sufficient support for instructional and other needs. Students have ready access to and support in using appropriate learning resources. The institution maintains direct and sole responsibility for the academic quality of all aspects of all programs and assures adequate resources to maintain quality. (See also 3.10)

SACSCOC - Application of Requirements The Commission on Colleges bases its accreditation of degree-granting higher education institutions and entities on requirements in the Principles of Accreditation: Foundations for Quality Enhancement. These requirements apply to all institutional programs and services, wherever located or however delivered. This includes programs offered through distance and correspondence education, off-campus sites, and branch campuses. Consequently, when preparing documents for the Commission demonstrating compliance with the Principles of Accreditation, an institution must include these programs in its “Institutional Summary Form Prepared for Commission Reviews” and address these programs in its analysis and documentation of compliance. (See Commission policy “Distance and Correspondence Education.”)

Theme: Equity and Serving the Needs of All

Adequate and equitable services are required to promote admission, retention and graduation for all students. This includes providing the resources necessary for students with special needs to succeed without being isolated or exempted from activities because they are not natively accessible. This is especially true of distance students and those taking mixed or online courses, as inaccessible material can negatively affect their ability to participate and succeed in the academic environment.

NEASC - 3.9 In accordance with established institutional mechanisms and procedures, the chief executive officer and the administration consult with faculty, students, other administrators and staff, and are appropriately responsive to their concerns, needs, and initiatives. The institution’s internal governance provides for the appropriate participation of its constituencies, promotes communications, and effectively advances the quality of the institution.

NEASC - 6.1 Consistent with its mission, the institution sets and achieves realistic goals to enroll a student body that is broadly representative of the population the institution wishes to serve and addresses its own goals for the achievement of diversity among its students.

NEASC - 6.2 The institution has an orderly and ethical program of admission that complies with the requirements of legislation concerning equality of educational opportunity. Its admission and retention policies and procedures are clear, consistent with its mission and purposes, and available to all students and prospective students electronically and through other appropriate publications.

NEASC - 6.5 The institution demonstrates its ability to admit students who can be successful in the institution's academic program, including specifically recruited populations. It ensures a systematic approach to providing accessible and effective programs and services designed to provide opportunities for enrolled students to be successful in achieving their academic goals. The institution provides students with information and guidance regarding opportunities and experiences that may help ensure their academic success.

HLC - Core Component 3c The organization creates effective learning environments.

- » The organization provides an environment that supports all learners and respects the diversity they bring.

HLC - Core Component 5b The organization has the capacity and the commitment to engage with its identified constituencies and communities.

HLC - Core Component 5c The organization demonstrates its responsiveness to those constituencies that depend on it for service.

NWCCU - 2.A.15 Policies and procedures regarding students' rights and responsibilities- including academic honesty, appeals, grievances, and accommodations for persons with disabilities- are clearly stated, readily available, and administered in a fair and consistent manner.

NWCCU - 2.A.18 The institution maintains and publishes its human resources policies and procedures and regularly reviews them to ensure they are consistent, fair, and equitably applied to its employees and students.

WASC - 1.5 Consistent with its purposes and character, the institution demonstrates an appropriate response to the increasing diversity in society through its policies, its educational and co-curricular programs, and its administrative and organizational practices.

Theme: Student Services / Student Needs / Student Success

Students are arguably the most important resource for any college or university. Therefore, serving those students must be a priority. Furthermore, there needs to be equity for all students. In adhering to a non-discrimination policy, institutions must provide adequate and equitable services for all of their students, including students with disabilities.

NEASC - 5.16 Instructional techniques and delivery systems, including technology, are compatible with and serve to further the mission and purposes of the institution as well as the learning goals of academic programs and objectives of individual courses. Methods of instruction are appropriate to the students' capabilities and learning needs. Scholarly and creative achievement by students is encouraged and appropriately assessed.

NEASC - STANDARD SIX: STUDENTS Consistent with its mission, the institution defines the characteristics of the students it seeks to serve and provides an environment that fosters the

intellectual and personal development of its students. It recruits, admits, enrolls, and endeavors to ensure the success of its students, offering the resources and services that provide them the opportunity to achieve the goals of their program as specified in institutional publications. The institution's interactions with students and prospective students are characterized by integrity.

NEASC - 6.3 Standards for admission ensure that student qualifications and expectations are compatible with institutional objectives. Individuals admitted demonstrate through their intellectual and personal qualifications a reasonable potential for success in the programs to which they are admitted. If the institution recruits and admits individuals with identified needs that must be addressed to assure their likely academic success, it applies appropriate mechanisms to address those needs so as to provide reasonable opportunities for that success. Such mechanisms receive sufficient support and are adequate to the needs of those admitted. The institution endeavors to integrate specifically recruited populations into the larger student body and to assure that they have comparable academic experiences.

HLC - Core Component 4c The organization assesses the usefulness of its curricula to students who will live and work in a global, diverse, and technological society.

HLC - Criterion Statement 5 As called for by its mission, the organization identifies its constituencies and serves them in ways both value.

MSC - Standard 9: Student Support Services The institution provides student support services reasonably necessary to enable each student to achieve the institution's goals for students.

WASC - 2.10 The institution collects and analyzes student data, disaggregated by demographic categories and areas of study. It tracks achievement, satisfaction, and campus climate to support student success. The institution regularly identifies the characteristics of its students and assesses their preparation, needs, and experiences.

NEASC - 6.11 The institution offers an array of student services appropriate to its mission and the needs and goals of its students, recognizing the variations in services that are appropriate at the main campus, at off-campus locations, and for programs delivered electronically as well as the differences in circumstances and goals of students pursuing degrees. In all cases, the institution provides academic support services appropriate to the student body. The institution's faculty and professional staff collectively have sufficient interaction with students outside of class to promote students' academic achievement and provide academic and career guidance. In providing services, in accordance with its mission and purposes, the institution adheres to both the spirit and intent of equal opportunity and its own goals for diversity. (See also 5.19, 7.7, 7.8, 8.3, and 11.8)

NEASC - 10.9 The institution publishes a description of the size and characteristics of the student body, the campus setting, the availability of academic and other support services, the range of co-curricular and non-academic opportunities available to students; and those institutional learning and physical resources from which a student can reasonably be expected to benefit.

HLC - Standard 8: Student Admissions and Retention The institution seeks to admit students whose interests, goals, and abilities are congruent with its mission and seeks to retain them through the pursuit of the students' educational goals.

WASC - 2.13 Student support services, including financial aid, registration, advising, career counseling, computer labs, and library and information services, are designed to meet the needs of the specific types of students that the institution serves and the curricula it offers.

Theme: Ethics and Integrity

A strong sense of Ethics and Integrity are essential requirements for all of the accreditation bodies. Included within these standards is the promotion and valuation of diversity and non-discrimination.

While there are a number of legal, technical and economic reasons to ensure that an institution's websites and courses are accessible, there is one basic unassailable argument for accessible design: It's the right thing to do. One of the basic precepts of the accreditation process is adherence to a set of ethical guidelines. The integrity of an institution can be heavily weighed by the way they treat their constituents, this includes treating students with disabilities as full and valuable members of the academic society. This is not possible when students are segregated by their inability to access the same materials as their peers.

NEASC - 11.5 The institution adheres to non-discriminatory policies and practices in recruitment, admissions, employment, evaluation, disciplinary action, and advancement. It fosters an atmosphere within the institutional community that respects and supports people of diverse characteristics and backgrounds.

HLC - Core Component 1e The organization upholds and protects its integrity.

- » The organization consistently implements clear and fair policies regarding the rights and responsibilities of each of its internal constituencies.

MSC - Standard 6: Integrity In the conduct of its programs and activities involving the public and the constituencies it serves, the institution demonstrates adherence to ethical standards and its own stated policies, providing support for academic and intellectual freedom.

NWCCU - 2.A.22 The institution advocates, subscribes to, and exemplifies high ethical standards in managing and operating the institution, including its dealings with the public, the Commission, and external organizations, and in the fair and equitable treatment of students, faculty, administrators, staff, and other constituencies. It ensures complaints and grievances are addressed in a fair and timely manner.

WASC - 1.8 The institution exhibits integrity in its operations, as demonstrated by the implementation of appropriate policies, sound business practices, timely and fair responses to complaints and grievances, and regular evaluation of its performance in these areas.

Theme: Risk Management

In these tight financial times, it is crucial that institutions do everything possible to protect their financial resources. The number of lawsuits and legal complaints by advocate groups and students with disabilities is growing and institutions that are not addressing accessibility do so at the risk of expensive litigation.

NWCCU - 2.F.1 The institution demonstrates financial stability with sufficient cash flow and reserves to support its programs and services. Financial planning reflects available funds, realistic development of financial resources, and appropriate risk management to ensure short-term solvency and anticipate long-term obligations, including payment of future liabilities.

NEASC - 9.7 The institution ensures the integrity of its finances through prudent financial management and organization, a well-organized budget process, appropriate internal control mechanisms, risk assessment, and timely financial reporting to internal and external constituency groups, providing a basis for sound financial decision-making.

As you can see, much of what makes web accessibility important is already inherent in the standards and guidelines of the major accrediting bodies for Higher Education. By promoting accessible websites and courses, regional accrediting agencies can provide guidance for equitable and quality education to all of their constituents as well as emphasizing the importance of diversity and non-discrimination in higher education.

DIVERSITY STATEMENT

The agency supports and enforces equal employment and educational opportunities for all, regardless of race, ethnicity, religion, gender, national origin, disability, sexual orientation or any other significant aspects of individuals and cultural identity.

ACCESSIBILITY TO INFORMATION COMMUNICATION TECHNOLOGY

A Position Statement

ISSUE

Equitable access to higher education has long been recognized as a challenge experienced by many individuals, including those from racial and ethnic groups, women, students from low socioeconomic status and students with disabilities. Today, many of the barriers that have historically limited these students' ability to succeed have been removed or reduced.

However, while many obstacles to higher education are less of an issue, for some students with disabilities, simply gaining physical access to a higher education institution is not enough. Many students still do not have equal access to course content. While buildings and physical spaces have been constructed to be accessible, digital materials and instructional websites should likewise be created to provide fair and equitable access to all. Without equal access to digital information, including institutional websites, students with disabilities face unnecessary barriers to their success.

Access to an institution's website is integral to an increasing number of functions in higher education today. These functions go well beyond online courses and course materials: essential activities such as registration, library services, and testing require online interaction. Moreover, most faculty and staff must utilize digital environments and the institutional web in order to do their work and participate in the mission of the institution.

Given the growing reliance on digital environments, it is essential that all students, faculty, and staff members have the access they need to succeed. This includes students, faculty, and staff members with disabilities who may be dependent on the accessibility and usability of those environments to participate fully in higher education and the activities of their institution.

Moreover, student learning outcomes are strongly affected by accessibility. If students with disabilities do not have equal access to educational materials, their outcomes will suffer. Digital materials that are made accessible after-the-fact do not provide an equivalent educational experience. Students who cannot readily access information and materials are put at a serious disadvantage during a period in education when just-in-time learning, communities of practice, and critical thinking pedagogies proliferate. In addition, providing accessible digital materials and processes only when students, faculty, or staff request them is an inefficient and costly way to make content accessible, especially when one considers that an institution has an affirmative obligation to plan in advance of a need for an accommodation. Since it is reasonable to think persons with disabilities will be visiting web content, it should be made accessible before they need this content.

A commitment to digital accessibility also provides valued added benefits to a number of other student groups. This includes those for whom English is a second language; students with different learning styles or who prefer multimodal learning; and those who are working on older equipment

or in environments where they cannot fully utilize their equipment (e.g., in places where it is difficult to hear or where sound is not allowed, captioned videos can be helpful).

APPROPRIATE APPROACHES

An effective institutional tactic for web accessibility is a whole system approach. The interconnected nature of the web means that accessibly designed webpages are still inaccessible if a student must navigate through the architecture of an inaccessible institutional web to reach them. However, a system-wide approach requires administrative endorsement and leadership. Initiatives or policies set and supported by top level administrators will help to promote a culture of inclusion and digital accessibility across the institution.

Web accessibility does not just happen; it requires planning, resource provisions, personnel and an ongoing review of progress. Any plan or policy should start with the selection of a technical standard widely supported in the field (e.g., Section 508 is created and adopted by the U.S. federal government and WCAG 2.0 is created by the W3C and accepted by the international community). Then, accessibility efforts should be informed by the best practices in web development.

As legislation changes and more institutions recognize the benefits of digital accessibility, the number of resources available to assist institutions to promote and maintain web accessibility have grown and will continue to do so. Furthermore, while each institution is different, a great deal can be learned from the experiences of other member institutions.

AGENCY'S STANCE

An institution that creates and maintains an accessible digital environment underscores its commitment to diversity, inclusion, and student outcomes. It is likely to also help fulfill the mission of the institution.

A central tenet of this agency's philosophy is that institutions should dedicate themselves to ensuring the quality and effectiveness of their programs and services. Administrative and educational programs and services can only be truly effective if they provide support for all, including those with disabilities.

Providing an inclusive and supportive environment for teaching and learning is a critical part of postsecondary education. Therefore, this agency supports and encourages its member institutions to take a leadership role in developing, procuring and maintaining accessible digital materials and institutional web content.

LANGUAGE AND STATEMENTS FOR USE BY ACCREDITATION AGENCIES

Short Statement

The agency expects an institution to ensure that its environments and resources — both physical and digital — are accessible, usable, and adaptable to all students and faculty.

One Paragraph Statements

OPTION 1

In an age when computers and the internet are integral to higher education, the delivery of web-based information in ways that does not discriminate against individuals with disabilities is a crucial issue. If digital materials are not accessible, it affects the timeliness and quality of student engagement and negatively impacts student independence and self-determination. Moreover, ensuring that students (and others) have the same ability to take advantage of online materials and services not only addresses student needs and outcomes but also supports the core mission of most institutions and is in line with the precepts and tenets advocated by this agency.

OPTION 2

In an age when computers and the internet are integral to higher education, it is essential to ensure that web-based information is accessible to all — including students, faculty and staff with disabilities. If digital materials are not accessible, it affects the timeliness and quality of student engagement and negatively impacts student independence and self-determination. Moreover, exclusion and discrimination of those with disabilities is antithetical to values and missions of this agency and its constituent institutions.

Half Page Statement

The delivery of web-based information in ways that do not discriminate against individuals with disabilities is a crucial issue for institutions in a digital age. Through technology, universal design can provide equitable access to students, faculty, and staff members with disabilities. Moreover, equal access facilitates full participation in the academic experience. Ensuring that students, and others, have the same ability to take advantage of online materials and services not only address student needs but also supports the core mission of most institutions and serves society at large. It is also the law.

Student learning outcomes are strongly affected by accessibility. If students with disabilities do not have timely equal access to educational materials and processes, their outcomes will ultimately suffer. Inaccessible materials affect the timeliness and quality of student engagement in their education and negatively impacts student independence and self-determination. Furthermore, the right of faculty members with disabilities to teach, investigate, and publish freely may depend upon the issue of access.

Accessible materials can improve academic outcomes for students without disabilities as well. They can provide enhanced learning for other groups such as those who prefer multi-modal learning, or are working with older technologies, or those for whom English is a second language.

In order to be truly effective, web accessibility needs to be an institution-wide effort. The interconnected nature of the internet means that a single accessible page is worthless if one must navigate inaccessible pages to get to it. It should be noted however that an institution's efforts to improve system-wide accessibility can also provide a value-added benefit: The foundation for web accessibility is present in the existing guidelines of this agency's requirements for accreditation and may be useful in helping make your case for compliance as you prepare for reaffirmation.

ACCREDIBILITY: USING YOUR WEB ACCESSIBILITY EFFORTS AS EVIDENCE DURING REAFFIRMATION

In addition to creating resources that institutions can use to assess, plan for, and improve their web accessibility, the staff members of Project GOALS are committed to finding ways to make the most of your institutional accessibility efforts. One way that institutions can capitalize on their work is to include digital accessibility as part of reaffirmation efforts with their regional accrediting body. The ways this can be done are as varied as the accrediting agencies and their constituent institutions. However, GOALS staff has completed an analysis of the Principles, Standards and Criteria of the six regional accreditation commissions that oversee higher education in the United States. We hope this information is helpful as you plan to include web accessibility into your accreditation or reaffirmation efforts.

Regional Accreditation Commissions:

- » Middle States Association of Colleges and Schools – Commission on Higher Education (MSC) – <http://www.msche.org/>
- » New England Association of Schools and Colleges – Commission on Institutions of Higher Education (NEASC) – <http://www.neasc.org>
- » North Central Association of Colleges and Schools – Higher Learning Commission (HLC) – <http://www.ncahigherlearningcommission.org>
- » Northwest Commission on Colleges and Universities (NWCCU) – <http://www.nwccu.org>
- » Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) – <http://www.sacscoc.org/>
- » Western Association of Schools and Colleges – Accrediting Commission for Senior Colleges and Universities (WASC) – <http://www.wascsenior.org>

Web accessibility maps onto the existing requirements for all of the accrediting agencies. So it may be a straightforward proposition that institutional efforts to improve web accessibility can be used to provide either compliance or evidence of continuous quality improvement during reaffirmation. Several broad themes emerged as potential venues for inculcating web accessibility into the accreditation process. While not an exhaustive listing, and bearing in mind that each institution will need to adapt the themes to their own situations, we have created a document highlighting several of these themes and providing information on how they relate to web accessibility efforts. The document is ***Mapping Accessibility onto Existing Accreditation Standards and Criteria [Appendix A]***.

In addition to the standards, criteria or principles provided by the Regional Accrediting Commission, web accessibility efforts may also serve as one aspect of an institution's quality improvement plans. While quality enhancement work generally focuses on student outcomes, many of these plans lend themselves quite handily to the inclusion of students with disabilities. GOALS staff recently conducted a thematic analysis of the QEPs (Quality Enhancement Plans) for project partner SACSCOC's constituent institutions over a two year period. Over 160 QEPs were posted. The following is a breakdown of some of the major themes found in these plans.

- » Reading/Writing/Literacy/Oral Skills/Information Literacy (50)
- » Critical Thinking/Contextual Learning/Active Learning (44)
- » Remediation (22)
- » Freshman Experience (20)
- » Diversity/Ethics/Values/Globalization (19)
- » Math (16)
- » Teamwork/Collaboration (9)
- » Technology (8)
- » Student Scholarship (7)
- » Real World Training/Career/Professionalism (6)
- » Academic Advising/Mentoring (6)
- » Access to JIT materials (3)
- » Student Retention/Completion (2)

While some of these themes are an obvious fit (Diversity, Technology, Ethics, Remediation etc...) many others can also benefit from including digital accessibility as part of the plan. For example, when considering the Freshman Experience, you should consider all of your students. How can an institution promote literacy if materials are in a format that is inaccessible to a portion of your population? If you are hoping to encourage critical thinking and active learning, it is important to make sure that the materials you are using promote learning for all students (e.g., how "active" can learning be if the student must wait for materials or rely on others for help?). If you are promoting Teamwork and Collaboration what kind of message does it send when some students are not able to participate due to accessibility issues; and how does this translate to the professional world where excluding those with disabilities runs afoul of anti-discrimination laws?

Each institution is different and will need to find its own path when including web accessibility in work with their regional accreditation commission. However, promoting an environment of inclusiveness is not only the right thing to do, but it can also provide your institution with valuable evidence while building the case for reaffirmation.

BEST PRACTICES FOR INSTITUTION-WIDE WEB ACCESSIBILITY

The internet has become an integral facet of modern higher education. Use of the web in education has evolved well beyond the occasional online or distance course. It is estimated that by 2015, 25 million postsecondary students will take some or all of their classes online.¹ Most face-to-face courses utilize online resources and activities such as scheduling and registration are among the many institutional functions now done almost exclusively over the web. Students and teachers alike take advantage of online management systems to access records, post and check grades, submit applications for employment, and deal with financial and insurance matters. In point of fact, one cannot fully participate in higher education today without access to the web.

For many persons with disabilities, the web is a double-edged sword. While an accessibly-designed website can mitigate or remove barriers, an inaccessible one can create them. When institutional websites are not accessible, many with disabilities are unable to independently complete the tasks required of them to compete in the academic arena. Student learning outcomes are also affected by accessibility. If these students do not have timely access to educational materials and processes, their outcomes can ultimately suffer. Inaccessible materials affect the timeliness and quality of student engagement in their education and can negatively impact student independence and self-determination. Furthermore, the right of faculty members with disabilities to teach, investigate, and publish freely may depend upon the issue of access as well.

An accessible web architecture can help provide equitable access to many students, faculty, and staff members with disabilities. Ensuring that students and others have the same ability to take advantage of online materials and services not only addresses student needs but also supports the core mission of most institutions and serves society at large. It is also falls within the legal realms of Title II of the ADA and Section 504 of the Rehabilitation Act.²

It should be noted however that an institution's efforts to improve system-wide accessibility can also provide value-added benefits: Accessible materials can improve academic outcomes for students without disabilities as they can provide enhanced learning for other groups such as those who prefer multi-modal learning, or those for whom English is a second language. Furthermore, the foundation for web accessibility is present in the existing guidelines of all regional accrediting agencies and may be useful in helping make the case for compliance or serve as a component in quality improvement plans as an institution prepares for reaffirmation.

However, in order to be truly effective, web accessibility needs to be an institution-wide effort. The interconnected nature of the internet means that access to a single page is worthless if one must

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1. Nagel, D. (2011, January 26). Online learning set for explosive growth as traditional classrooms decline. Retrieved from <http://campustechnology.com/articles/2011/01/26/online-learning-set-for-explosive-growth-as-traditional-classrooms-decline.aspx>
 2. DOJ (2010, April 22). Principal Deputy Assistant Attorney General for Civil Rights Samuel R. Bagenstos testifies before the House Judiciary Subcommittee on the Constitution, Civil Rights and Civil Liberties. Retrieved from <http://www.justice.gov/crt/speeches/2010/crt-speech-100422.html>

navigate inaccessible pages to get to them. This document provides an outline of best practices for implementing and maintaining an accessible web presence across your institution.

The institutional best practices outlined in this document are organized by the presence of four key indicators important to success. These indicators are comprised of several benchmarks. Descriptions of Indicators and benchmarks are provided along with examples and essential components for individual benchmarks.

Indicator #1: Institutional Vision and Leadership Commitment

Institution-wide web accessibility is best attained and sustained when there is leadership to support a vision and commitment toward institutional accessibility. This support should come from many levels including an institution's governing board, central administration, and key personnel. Each must actively support, participate, and take ownership in the work and outcomes of accessibility.

Two Benchmarks distinguish Institutional Vision and Leadership Commitment:

BENCHMARK A: THE COMMITMENT OF ADMINISTRATIVE LEADERSHIP

Administrative leadership begins with a vision and commitment toward change. Typically this vision, and its leadership support, stems from efforts made at top administrative levels within an institution. For some systems this would also include the institution's board of governors or trustees. Over time the leadership commitment results in the development and enforcement of an accessibility policy and plan, along with the necessary resources to implement them.

Examples of administrative commitment:

- » An institutional statement of vision or commitment to web accessibility
- » The creation and support of a web accessibility task force or institution-wide accessibility group
- » An institutional policy on web accessibility
- » An institution-wide accessibility action plan
- » The availability of resources for web accessibility efforts
- » Efforts to advance the visibility, promotion, and communication of web accessibility efforts

BENCHMARK B: RELEVANT STAKEHOLDER PARTICIPATION

Including relevant personnel in the planning, implementation, and maintenance of web accessibility provides vital input, fosters ownership across stakeholders, and assists in sustaining the goal of an accessible web presence. Faculty, staff, and students should be included as stakeholders as they are involved in the development, maintenance or use of institutional web content. Stakeholder's knowledge and ownership of their roles is important, as each will likely have slightly different responsibilities in planning for and achieving overall accessibility. These responsibilities encompass wide-ranging behaviors, including technical staff who design accessible web pages, faculty who identify and upload accessible materials into course management tools, staff who create accessible documents intended for the web, procurement staff who ensure that institutional purchases meet the accessibility standard chosen by the institution, and individuals with disabilities who provide

feedback on accessibility outcomes. The participation of all these diverse individuals is an important key for success and underscores the vision and commitment of leadership to the end goal of institution-wide accessibility.

Examples of stakeholder participation:

- » Individuals representing a full range of stakeholders who are involved in institution-wide planning and continuous improvement
- » Institution personnel who are engaged in professional development that includes or is focused on web accessibility
- » Faculty, staff and students who take responsibility for web accessibility outcomes within their purview
- » Systems that are available for individuals to provide feedback on the implementation and outcomes of web accessibility

Indicator #2: Planning and Implementation

Web accessibility requires strategic planning. Administrators must establish policies and procedures along with a systematic plan to develop, institute, and maintain web accessibility across the organization.

Four Benchmarks distinguish Planning and Implementation of Institution-Wide Web Accessibility:

BENCHMARK A: THE INCLUSION OF KEY PERSONNEL

Identifying and involving personnel who represent key constituent groups at your institution is essential during both the planning and implementation process. Key accessibility personnel may come from many departments or units and represent disability advocates as well as leaders representing technical, faculty, and staff positions. Administrators identify and include these individuals for input as the institution moves from planning to implementation and maintenance of an institution-wide accessible web presence.

The broader group of stakeholders should also be included as important feedback mechanisms to the web accessibility efforts. Stakeholders are those who are either end users of web content or those who will implement the institution-wide plan. This benchmark can be differentiated from that found in Indicator 1, as the administrative vision exerted to include a variety of stakeholders is different from the actual participation of key personnel representing different stakeholders throughout the process.

Examples of participation:

- » The involvement of key accessibility personnel and those they represent in policy development
- » The involvement of key accessibility personnel and stakeholder groups in the development of an institution-wide web accessibility plan
- » The involvement of key accessibility personnel and stakeholders in the implementation of an institution-wide web accessibility plan

BENCHMARK B: A COMPREHENSIVE ACCESSIBILITY POLICY

A stated policy that provides specific guidelines and standards for web accessibility is necessary in order to ensure all administrators and stakeholders understand what is required of them. The web accessibility policy should appear in the same set of governing documents as other institution-wide policies, rather than as a separate unit. Once established, the institutional policy should be promoted and enforced.

Elements of a Comprehensive Policy include:

- » A summary statement of the policy
- » Effective date(s) for compliance to the policy
- » The scope of the policy
- » A recognized technical standard for web accessibility (e.g., Section 508 or WCAG 2.0 AA)
- » A provision for procurement and collaborative resources
- » Consequences for non-conformance to the policy
- » Mechanisms for ongoing review

BENCHMARK C: A COMPREHENSIVE WRITTEN ACCESSIBILITY PLAN

An institution-wide effort requires a systematic plan of action. This plan includes strategies for all aspects of implementation including: goals, timelines, budgeting, materials, personnel, ongoing assessment, and, when necessary, revision of the plan. For institutions that require a business plan for use during cycles of continuous improvement, these elements can serve as the basis for a prospectus that includes concept, marketing, position and market analysis, financial planning, and implementation.

Elements of a Comprehensive Accessibility Plan include:

- » An executive summary of the plan or a statement of concept for institution-wide web accessibility (Business Concept)
- » A provision for benchmarking and market evaluation (Position and Market Analysis)
- » A provision to gather baseline information (Position and Market Analysis)
- » Identification of existing institutional challenges and risks (Position and Market Analysis)
- » Identification of existing institutional priorities (Position and Market Analysis)
- » A process to communicate and market the plan to the campus and other communities (Marketing)
- » A provision for budget items appropriate to accomplish the plan (Financial Planning)
- » Metrics, milestones, and measurable steps (Implementation)
- » A timeline for rollout of the milestones and measurable steps (Implementation)
- » The assignment of specific responsibilities (Implementation)
- » An education plan for staff, faculty and students (Implementation)
- » An institution-wide plan to obtain and use feedback (Implementation)
- » A plan to monitor the progress of accessibility outcomes (Implementation)
- » An explicit strategy to evaluate and revise the plan in an ongoing way (Implementation)

BENCHMARK D: THE IMPLEMENTATION OF THE WRITTEN PLAN

Once the accessibility policy and plan are in place, administrators and others put that plan into action, ensuring it stays on track by continually monitoring and assessing its progress.

Evidence of this implementation may include:

- » Meeting minutes of the accessibility team/task force
- » Documentation of baseline information
- » A budget sufficient to support institution-wide accessibility efforts
- » Committed efforts by administration, faculty and staff to sustain web accessibility
- » Communication and marketing of the accessibility plan across campus and beyond
- » Data on web accessibility training for personnel
- » Documentation of implementation progress
- » Documentation on the feedback from different levels of implementation
- » Indications of actions taken for nonconforming web content
- » Web accessibility outcome data

Indicator #3: Resources and Support

An institution-wide web accessibility plan requires adequate resources and support. Administrators must provide the resources necessary to implement the web accessibility plan with provisions to ensure that the system is sustainable and will remain accessible.

Five Benchmarks distinguish the Resources and Support required for Institution- Wide Web Accessibility:

BENCHMARK A: FOCUS ON PERSONNEL

An effective plan cannot be carried out without personnel who have the expertise to implement it. Make sure you focus on hiring, retaining, and supporting personnel at all levels who will help your institution attain its accessibility goals. For example you need to have technical individuals, and those with special responsibilities, to implement the web accessibility plan. Moreover, typical faculty and staff have multiple responsibilities that require their time and attention. Therefore, it is important to provide them with clear and helpful information, sufficient time and support, and the motivation or incentives to ensure that they give the accessibility work in the plan the necessary attention.

Examples of a Focus on Personnel:

- » Position announcements for technical individuals that include requirements for accessibility experience or knowledge
- » The presence of incentives and motivators for faculty and staff participation in accessibility efforts
- » The collection of data on retention rates for personnel key to accessibility implementation

BENCHMARK B: SUFFICIENT TIME AND EFFORT ALLOCATED TO PERSONNEL

The process to move to an accessible web presence takes time. Both the time and effort required for this work should be identified when allocating faculty and staff responsibilities.

Examples of provisions for sufficient time and effort:

- » The recognition of accessibility work in job descriptions and role statements
- » The recognition of accessibility work in personnel time and effort reports
- » The collection and use of feedback on the sufficiency of personnel allocation for web accessibility efforts

BENCHMARK C: A BUDGET SUFFICIENT FOR INSTITUTION-WIDE EFFORTS

Administration should take financial requirements into account when developing the written accessibility plan and design budgets accordingly. Necessary materials, licenses, equipment, personnel, and training should be considered. The funding necessary to sustain accessibility of the system should also be factored into the budget.

Methods of determining if the budget is sufficient may include:

- » Reports that specifically evaluate the sufficiency of available web accessibility resources
- » A review of reports and statements monitoring the use of accessibility resources
- » Feedback from key personnel and those involved in the implementation of the plan

BENCHMARK D: TRAINING AND TECHNICAL SUPPORT

All personnel (i.e., faculty and staff) should be provided with the knowledge, support, and materials they require to carry out their roles in implementing institution-wide web accessibility.

Examples of training and technical support:

- » Trainings for faculty, staff, and students which occurs in conjunction with their expected accessibility roles
- » Technical assistance and support that is available to, and used by, faculty, staff, and students
- » The presence and use of materials necessary to support training, technical assistance, and implementation

BENCHMARK E: THE PROCUREMENT, DEVELOPMENT, AND USE OF TECHNOLOGIES THAT WILL RESULT IN ACCESSIBLE WEB CONTENT

To create and maintain an accessible web architecture, personnel should choose tools that possess or render accessible web content. Failing to procure or develop accessible technologies perpetuates new and existing problems. A strong procurement policy, with language included in contracts, helps ensure that personnel use the institution's resources wisely and that products are purchased in line with institution-wide web accessibility efforts. This includes programs such as open source, shareware, and freeware that don't go through the traditional procurement process.

Examples of technology procurement, development and use of that will result in web accessibility:

- » Accessibility procurement language that is included in contracts, is consistent with the

- institutional standard, and used as part of the selection process for purchasing.
- » The existence and enforcement of accessibility requirements for course resources that are shared but originate from other institutions or organizations.
- » Products that are developed by the institution meets the institution's stated accessibility standard.

Indicator #4: Assessment

Ongoing assessment is necessary to ensure that your web accessibility plan is working and on track. Processes must be in place to measure progress, constituent satisfaction, and outcomes. This information is then used to help determine the sustainability of the current efforts and make improvements to the overall program.

Three Benchmarks distinguish the Assessment Necessary for Institution-Wide Web Accessibility:

BENCHMARK A: EVALUATION OF IMPLEMENTATION PROGRESS

Provisions are made to ensure that the plan is implemented as intended (e.g., scope, training, and support of staff, timelines). Progress is monitored and evaluated to ascertain if implementation is occurring at predicted levels, and that alterations in planned implementation are identified and communicated.

Examples of progress evaluation:

- » The collection and analysis of data or information of an institution's progress within the implementation process
- » Formal reports on the progress of the intended implementation plan
- » Informal summaries or communications on the progress of the implementation plan

BENCHMARK B: EVALUATION OF WEB ACCESSIBILITY OUTCOMES

No plan or policy is useful if it does not result in the intended outcome. Those tasked by the institution to improve web accessibility must periodically monitor and evaluate its status to determine if it is meeting the institution-wide web accessibility standard. Because automated web accessibility tools don't provide a complete assessment picture, key accessibility personnel should include manual checks in their evaluation plans. As technology and standards change over time, it is also important that the institution determine if the stated outcome is sufficient or if alterations could bring it more in line with current standards and practices.

Examples of the evaluation of web accessibility outcomes:

- » The collection and analysis of institutional web accessibility data
- » The development of institutional reports containing web accessibility data or summaries
- » The creation of reports from external evaluations of web accessibility outcomes
- » The collection and use of correspondence describing accessibility outcomes

BENCHMARK C: ASSESSMENT RESULTS ARE USED TO IMPROVE INSTITUTIONAL ACCESSIBILITY

Data gathered from evaluations of both the process and the outcomes of web accessibility are of little value unless they are used to improve and inform what is to happen in the future. Those tasked by the institution to improve web accessibility) should maintain ongoing oversight and review data sources continually to revise procedures to ensure the institution can create and maintain institution-wide web accessibility. These same data should also be used for future changes in institutional policy.

Methods of determining that assessment results are used for improvement:

- » The development and use of reports that reflect data-based recommendations for change
- » Documentation that describes how data sources inform institutional efforts

TEMPLATE FOR INSTITUTIONAL WEB ACCESSIBILITY ACTIVITIES

Institutions who wish to document web accessibility efforts as part of continuous improvement for reaffirmation may benefit from a template to collect institutional data and information. This template provides a guide for doing so. This template can be used in conjunction with the **Best Practices for Institution-Wide Web Accessibility Document (Appendix F)** to help provide a structure for including web accessibility efforts in reaffirmation reports or quality improvement outlines. *Ensuring that your institution's web presence is accessible to all, including those with disabilities, is not only the right thing to do; it also provides a number of benefits to your institution:*

- » It reflects institutional mission, leadership and values.
- » It affects constituents at every level of your institution: including students, faculty and staff, prospective students and staff, and alumni and community members.
- » It promotes sound fiscal policy: It is more efficient than after-the-fact fixes; assists in recruitment and retention of students and faculty with disabilities that affect computer and internet use; enhances collaborative possibilities in both the US and abroad; protects the institution from some legal complaints; supports public relations and development work and; satisfies the expectations of funding agencies that have begun to require accessible information communication for some grants and contracts.
- » It adds value: It assists students for whom English is a second language; it supports multi-modal learning; it allows access by those using older equipment, slow modems, or in places where sound is not allowed and; it is likely to help your website continue to work as technologies evolve (forward compatible). Furthermore, accessible content tends to have a higher return on prominent search engines (e.g., Google) and is more robust. This means it should work more reliably across different browsers and devices, such as netbooks and mobile phones.
- » **Finally, it can also provide a value-added benefit: the foundation for web accessibility is present in the existing guidelines of all regional accreditation agencies' standards, criteria and principles. Your institution's accessibility work may be useful in helping make your case for compliance as you prepare for reaffirmation. You may even be able to use your efforts as a component in quality improvement plans.**

While each institution is different and you will have to look at your web accessibility efforts in terms of your own academic venue, you may find a multitude of opportunities to use your digital accessibility efforts as evidence of compliance for your regional accreditor or as part of your quality enhancement schemas.

These templates are provided to help you to organize and outline your evidence. Some examples of evidence are provided for each benchmark. However, they do not represent the full spectrum of evidence that may be appropriate for your institution.

Please feel free to use and adapt the templates to best suit your institutional needs. Depending upon the conventions of your accrediting agency, you may choose to highlight your web accessibility efforts as a whole, describing how each benchmark is applicable to the requirements of your

agency (*see example 1*); you may choose to embed specific benchmarks into the narrative of your evidence for a given principle, criteria or standard (*see example 2*); you may choose to embed web accessibility into your quality improvement plans and use the templates to structure your impact (*see example 3*) or, you may adapt the template in any other way that makes sense for your venue. You can cut and paste the pieces into other reports, add additional columns and outlines, mix and match, or consolidate the information as you see fit. A copy of the template is available as a [Word Document](#) to make it easier to incorporate into your existing documents.

Please note: The template format is the same for all benchmarks except the templates for Indicator 2, Benchmarks B and C: (An Accessibility Policy and A Written Accessibility Plan). These templates are set up to indicate the robustness of the documents based on important components that should be included in comprehensive policies or plans.

Indicator #1: Institutional Vision and Leadership Commitment

BENCHMARK A: THE COMMITMENT OF ADMINISTRATIVE LEADERSHIP

Evidence of Administrative Leadership can include:

- » A posted statement of vision or commitment
- » The creation and maintenance of a web accessibility task force or institution-wide accessibility group
- » An official institutional policy on web accessibility
- » An institution-wide accessibility action plan
- » Resources that are available for web accessibility efforts
- » Activities to promote the visibility, endorsement and communication of web accessibility efforts

<i>This benchmark specifically supports requirements or plans by:</i>			
Evidence	Description	Supporting Documentation	Additional Notes
<i>Describe any evidence that is currently in development</i>			

BENCHMARK B: RELEVANT STAKEHOLDER PARTICIPATION

Evidence of Stakeholder Participation can include:

- » The participation of individuals who represent the full range of stakeholders in institution-wide planning and continuous improvement
- » Engagement by personnel in professional development that includes or is focused on web accessibility
- » Faculty, staff and students who take responsibility for web accessibility outcomes within their purview
- » Available systems for individuals to provide feedback on the implementation and outcomes of web accessibility

<i>This benchmark specifically supports requirements or plans by:</i>			
Evidence	Description	Supporting Documentation	Additional Notes
<i>Describe any evidence that is currently in development</i>			

Indicator #2: Planning and Implementation

BENCHMARK A: THE INCLUSION OF KEY PERSONNEL

Evidence of the Inclusion of Key Personnel can include:

- » Involvement of key accessibility personnel and those they represent in policy development
- » Involvement of key accessibility personnel and stakeholder groups in the development of an institution-wide web accessibility plan
- » Involvement of key accessibility personnel and stakeholders in the implementation of an institution-wide web accessibility plan

This benchmark specifically supports requirements or plans by:

Evidence	Description	Supporting Documentation	Additional Notes

Describe any evidence that is currently in development

BENCHMARK B: A COMPREHENSIVE ACCESSIBILITY POLICY

Accessibility Policy Checklist:*

This benchmark specifically supports requirements or plans by:

Policy Element	Yes/No	Key Points	Supporting Documentation	Additional Notes
A summary statement of the policy				
Effective date(s)				
The scope of the policy				
A technical standard for Web Accessibility				
A provision for procurement				
Consequences for non-conformance to the policy				
Mechanisms for ongoing review				

Describe any work that is currently being done to develop a Comprehensive Policy				

**Put any additional elements of the policy in the spaces provided*

BENCHMARK C: A COMPREHENSIVE WRITTEN ACCESSIBILITY PLAN

Written Accessibility Plan Checklist*:

<i>This benchmark specifically supports requirements or plans by:</i>				
Plan Element	Yes/No	Key Points	Supporting Documentation	Additional Notes
An executive summary of the plan or statement of concept				
A provision for benchmarking and market evaluation				
A provision to gather baseline information				
Identification of existing institutional challenges and risks				
Identification of existing institutional priorities				
A process to communicate and market the accessibility plan to the campus and other communities				
A provision for budget items appropriate to accomplish the plan				
Metrics, milestones and measurable steps				
A comprehensive timeline				
Assignment of specific responsibilities				

An education plan for staff, faculty and students				
A plan to obtain and use feedback institution-wide				
A plan to monitor the progress of accessibility outcomes				
An explicit strategy to evaluate and revise the plan in an ongoing way				
<i>Describe any work that is currently being done to develop a Comprehensive Policy</i>				

**Put any additional elements of the policy in the spaces provided*

BENCHMARK D: THE IMPLEMENTATION OF THE WRITTEN PLAN

Evidence of the Implementation of the Written Plan can include:

- » Meeting minutes of the accessibility team/task force
- » Baseline information on the Institution's web accessibility
- » An Institution-wide budget committed to sustaining web accessibility
- » Campus communications and marketing of the accessibility plan.
- » Data on training personnel
- » Tracking and documentation of implementation progress
- » Data and feedback from end users and those involved in implementation of the plan
- » Indications of actions taken for nonconforming web content
- » Web accessibility outcome data

<i>This benchmark specifically supports requirements or plans by:</i>			
Evidence	Description	Supporting Documentation	Additional Notes

<i>Describe any evidence that is currently in development</i>			

Indicator #3: Resources and Support

BENCHMARK A: A FOCUS ON PERSONNEL

- » The presence of incentives and motivators for participation in accessibility efforts
- » Data on retention rates for personnel key to accessibility implementation

<i>This benchmark specifically supports requirements or plans by:</i>			
Evidence	Description	Supporting Documentation	Additional Notes
<i>Describe any evidence that is currently in development</i>			

BENCHMARK B: SUFFICIENT TIME AND EFFORT ALLOCATED TO PERSONNEL

- » Accessibility work that is recognized in job descriptions and role statements
- » Personnel time and effort reports that recognize accessibility work
- » The collection and use of feedback and data on the sufficiency of personnel allocation

This benchmark specifically supports requirements or plans by:

Evidence	Description	Supporting Documentation	Additional Notes

Describe any evidence that is currently in development

BENCHMARK C: A BUDGET SUFFICIENT FOR INSTITUTION-WIDE EFFORTS

- » Feedback and data on the sufficiency of budget allocation
- » Budget allocations and spending that is in line with the accessibility plan

This benchmark specifically supports requirements or plans by:

Evidence	Description	Supporting Documentation	Additional Notes

Describe any evidence that is currently in development

BENCHMARK D: TRAINING AND TECHNICAL SUPPORT

- » The training of faculty, staff and students on accessibility practices occurs in conjunction with their expected accessibility roles
- » Technical assistance and support that is available to, and used by, faculty, staff and students
- » The presence of the materials necessary to support training, technical assistance and implementation

<i>This benchmark specifically supports requirements or plans by:</i>			
Evidence	Description	Supporting Documentation	Additional Notes
<i>Describe any evidence that is currently in development</i>			

BENCHMARK E: THE PROCUREMENT, DEVELOPMENT, AND USE OF TECHNOLOGIES THAT WILL RESULT IN ACCESSIBLE WEB CONTENT

- » Accessibility procurement language that is included in contracts and is consistent with the institutional standard
- » Accessibility requirements are present for courses or course resources that originate from other institutions or organizations
- » Products developed by the institution are required to meet the accessibility standard
- » Products developed by the institution do meet or exceed the accessibility standard

<i>This benchmark specifically supports requirements or plans by:</i>			
Evidence	Description	Supporting Documentation	Additional Notes

<i>Describe any evidence that is currently in development</i>			

Indicator #4: Assessment

BENCHMARK A: THE EVALUATION OF IMPLEMENTATION PROGRESS

- » Data or information on institutional progress within the implementation process
- » Formal reports on the progress of the intended implementation plan
- » Informal summaries or communications on the progress of the implementation plan

<i>This benchmark specifically supports requirements or plans by:</i>			
Evidence	Description	Supporting Documentation	Additional Notes
<i>Describe any evidence that is currently in development</i>			

BENCHMARK B: EVALUATION OF WEB ACCESSIBILITY OUTCOMES

- » Institutional web accessibility data
- » Institutional reports that contain web accessibility data or summaries

- » Reports from external evaluations of web accessibility outcomes
- » Correspondence describing outcomes

<i>This benchmark specifically supports requirements or plans by:</i>			
Evidence	Description	Supporting Documentation	Additional Notes
<i>Describe any evidence that is currently in development</i>			

BENCHMARK C: ASSESSMENT RESULTS ARE USED TO IMPROVE INSTITUTIONAL ACCESSIBILITY

- » Reports that reflect data-based recommendations for change
- » Documentation that describes how data sources inform institutional efforts

<i>This benchmark specifically supports requirements or plans by:</i>			
Evidence	Description	Supporting Documentation	Additional Notes
<i>Describe any evidence that is currently in development</i>			

WEB ACCESSIBILITY TEMPLATE EXAMPLES FOR YOUR REAFFIRMATION PORTFOLIO

The following are three examples of how a template can be used to document web accessibility efforts as part of regional accreditation within postsecondary education; in this instance for the reaffirmation portfolio. The content in each of these 3 examples is the same; we choose to display how an institution might describe their efforts to improve faculty and staff skills in web accessibility through professional development. This maps onto work for GOALS Indicator 3 (i.e., Resources and Supports), Benchmark D (i.e., Training and technical support). The only thing that varies across the 3 is the way in which the information is presented across the sample templates. So if you think you keep reading the same thing over, and over again, you would be correct. These are illustrations of different structural ways to report out on one aspect of your web accessibility efforts, that of training your faculties.

- » **Example 1** highlights web accessibility efforts as a whole, describing how each benchmark is applicable to the requirements of an accreditation agency.
- » **Example 2** embeds specific benchmarks into the evidence narrative for a given principle, criteria or standard.
- » **Example 3** embeds web accessibility into a quality improvement plan and uses the templates to structure the impact.

Please keep in mind that there is no “correct” method and that these are only samples. You are welcome (and encouraged) to adapt the template to your specific needs.

For the purposes of illustration, these examples use the Principles of Accreditation and the Quality Enhancement Plan (QEP) processes from the Southern Association of Colleges and Schools – Commission On Colleges (SACSCOC) Handbook.

Example 1– Promoting Your Web Accessibility Efforts as A Unified Whole

GOALS BENCHMARK D: TRAINING AND TECHNICAL SUPPORT

- » The training of faculty, staff, and students on accessibility practices occurs in conjunction with their expected accessibility roles
- » Technical assistance and support that is available to, and used by, faculty, staff, and students
- » The presence of the materials necessary to support training, technical assistance, and implementation

This benchmark specifically supports requirements or plans by:

Our work in this area can be used as supporting evidence for the following SACSCOC Comprehensive Standards:

3.7.3 The institution provides ongoing professional development of faculty as teachers, scholars, and practitioners. (Faculty development)

3.8.1 The institution provides facilities and learning/information resources that are appropriate to support its teaching, research, and service mission. (Learning/information resources)

3.8.3 The institution provides a sufficient number of qualified staff— with appropriate education or experiences in library and/or other learning/information resources—to accomplish the mission of the institution. (Qualified staff)

Additionally, our QEP focuses on Improving the Online Learning Environment for both Distance and On-Campus students. As part of the process, we are revamping our faculty training and professional development to include information on web accessibility for persons with disabilities.

Evidence	Description	Supporting Documentation	Additional Notes
Faculty Workshops	These workshops are offered each semester and focus on developing online materials. We include training and materials on web accessibility during these workshops	<p>A copy of the training materials are attached</p> <p>The attendance lists for the last 4 workshops are attached</p> <p>The announcement for the next workshop is available online at: www.randomwebaddress.edu</p>	The workshops are gaining popularity and we are considering adding a more intensive summer workshop
Technical Support Personnel	We have hired two new technology support people with accessibility experience who can support faculty and staff in their web accessibility efforts	Resumes of these staff are attached	Our new staff are starting to teach the existing personnel about accessibility so our pool of knowledge is growing

Our student Help Desk employees are required to attend the Faculty Workshops for online material development	All new and existing Help Desk staff are required to attend the workshops so that they understand the issues and can assist faculties, staff, and students who call in with questions	A list of Help Desk employees and attendance status is attached	
<p><i>Describe any evidence that is currently in development</i></p> <p>We are in the process of creating an online resource with information on how to make webpages and other materials accessible.</p>			

Example 2- Embedding Web Accessibility into the Narrative of A Given Principle, Criteria, or Standard

SACSCOC STANDARD 3.7 FACULTY

3.7.3 *The institution provides ongoing professional development of faculty as teachers, scholars, and practitioners. (Faculty development)*

Descriptions of faculty development activities and evidence that would normally be included under this principle (e.g. Faculty Orientation, Mentoring, Development Leaves, Faculty Assistance Centers...) This section can also include a narrative on how part of faculty development efforts include information and training to ensure that materials and teaching are created to be inclusive of students with disabilities. You could then use the template to organize the evidence of this statement.

Our institution engaged in training and professional development for faculty and staff to ensure that digital materials are accessible for students with disabilities (appropriate to their roles). These efforts support SACSCOC Comprehensive Standard 3.7.3. Furthermore, these activities are consistent with the Best Practices for Institution-wide Web Accessibility (see <http://ncdae.org/goals/accreditation/bestpractices.php>).

Specifically, our efforts in professional development support:

- » Indicator #1: Institutional Vision and Leadership Commitment
Benchmark A: The Commitment of Administrative Leadership
- » Indicator #2: Policy Planning and Implementation
Benchmarks C & D: The Existence Implementation of a Written Accessibility Plan (if the plan includes a provision for training)
- » Indicator #3: Resources and Supports
Benchmark D: Training and Technical Support

Evidence	Description	Supporting Documentation	Additional Notes
Faculty Workshops	These workshops are offered each semester and focus on developing online materials. We include training and materials on web accessibility during these workshops	A copy of the training materials are attached The attendance lists for the last 4 workshops are attached The announcement for the next workshop is available online at: www.randomwebaddress.edu	The workshops are gaining popularity and we are considering adding a more intensive summer workshop
Technical Support Personnel	We have hired two new technology support people with accessibility experience who can support faculty and staff in their web accessibility efforts	Resumes of these staff are attached	Our new staff are starting to teach the existing personnel about accessibility so our pool of knowledge is growing
Our student Help Desk employees are required to attend the Faculty Workshops for online material development	All new and existing Help Desk staff are required to attend the workshops so that they understand the issues and can assist faculties, staff, and students who call in with questions	A list of Help Desk employees and attendance status is attached	

Describe any evidence that is currently in development

We are in the process of creating an online resource with information on how to make webpages and other materials accessible.

Example 3- Embedding Web Accessibility into a Quality Enhancement Plan (QEP)

QEP TOPIC

Improving the Online Learning Environment for both Distance and On-Campus students.

Note: Web accessibility can be included in a QEP Report. While these plans are individual and vary based on the institution, this example shows how it can be included as a component of a QEP. Note the text in Red outlines the example. The templates could then be used in the QEP impact reports to highlight the work being done.

- » Background and Overview of the University
- » Description of the Current Online Environment
 - Definitions
 - ◇ Web Accessibility: Web accessibility refers to the practice of making websites usable by people of all abilities and disabilities.
- » Development of the QEP
 - Development Team
 - Key Issues
 - ◇ Web accessibility for students with disabilities is becoming a prominent issue for our institution. In addition to ensuring that all of our students have the ability to succeed, it also can provide benefits for students with mobile devices, students for whom English is a second language, and multi-modal learners. This issue is significant as it also is in line with evolving legislation and is the topic of a growing number of lawsuits.
 - Relevant Research
 - ◇ <http://www.ncdae.org/goals/actionpaper.php>
 - Institutional Capacity
- » Areas of Focus
 - GOAL3: Ensure that the institutional web is accessible to all – including those with disabilities
 - ◇ Objective 1 – Develop an Accessibility Policy
 - ◇ Objective 2 – Develop A Comprehensive Accessibility Plan
 - ◇ Objective 3 – Educate and Train Faculty and Staff on Creating Accessible Materials
- » Potential Impact of the Plan
 - Congruence with Principles and Mission of the University
 - ◇ Ensuring that the web is accessible is directly tied to our mission of a commitment to quality and a pledge to serve all of our students. It also promotes the institution as socially responsible and engaged with the needs of both the campus and broader community.

- Student Outcomes
 - ◊ An accessible web allows students with disabilities to engage in academic activities and education along with their peers without having to wait for materials to be adapted for them. This ability to independently interact with educational materials and the academic environment will allow these students to compete and complete their work without having to rely on others to progress. This will likely result in better academic outcomes and retention for these students. In addition, accessible digital materials have the potential to improve the outcomes of other students as well. Accessible materials can promote learning for students for whom English is a second language, those using mobile devices, multi-modal learners, and those using older equipment or working in environments where they cannot use their speakers.
- » Assessment of the QEP
 - Web Accessibility improvement will be assessed using a variety of methods including; iterative, manual and automated sampling of web pages, accessibility surveys from a variety of consumers, and evaluation of the requests and issues found by the disability resource center (DRC).

QEP IMPACT REPORT

Note: The narrative of the Impact Report would be developed with the templates being inserted where appropriate. For example, the template from the first two examples could be used to highlight the work done with faculty training and development:*

GOAL 3 - OBJECTIVE 3 – EDUCATE AND TRAIN FACULTY AND STAFF ON CREATING ACCESSIBLE MATERIALS

One of our objectives under GOAL 3 - <u>Ensure that the institutional web is accessible to all – including those with disabilities</u> was to educate and train faculty and staff to create accessible materials. This was undertaken in the following ways:			
Evidence	Description	Supporting Documentation	Additional Notes
Faculty Workshops	These workshops are offered each semester and focus on developing online materials. We include training and materials on web accessibility during these workshops	<p>A copy of the training materials are attached</p> <p>The attendance lists for the last 4 workshops are attached</p> <p>The announcement for the next workshop is available online at: www.randomwebaddress.edu</p>	The workshops are gaining popularity and we are considering adding a more intensive summer workshop

Technical Support Personnel	We have hired two new technology support people with accessibility experience who can support faculty and staff in their web accessibility efforts	Resumes of these staff are attached	Our new staff are starting to teach the existing personnel about accessibility so our pool of knowledge is growing
Our student Help Desk employees are required to attend the Faculty Workshops for online material development	All new and existing Help Desk staff are required to attend the workshops so that they understand the issues and can assist faculties, staff, and students who call in with questions	A list of Help Desk employees and attendance status is attached	
<p><i>Describe any evidence that is currently in development</i></p> <p>We are in the process of creating an online resource with information on how to make webpages and other materials accessible.</p>			

**Note – there are templates specifically for developing an accessibility policy and an accessibility plan in the template document.*

ACCREDITATION AND WEB ACCESSIBILITY: WHY SHOULD ACCREDITORS CARE?

Equitable access to higher education has long been recognized as a challenge experienced by many individuals, including those from racial and ethnic groups, women, students from low socioeconomic status and students with disabilities. Today, many of the barriers that have historically limited these students' ability to succeed have been removed or reduced.

However, while many obstacles to higher education are less of an issue, for some students with disabilities, simply gaining physical access to a higher education institution is not enough. Many students still do not have equal access to course content. While buildings and physical spaces have been constructed to be accessible, digital materials and instructional websites should likewise be created to provide fair and equitable access to all. Without equal access to digital information, including institutional websites, students with disabilities face unnecessary barriers to their success.

Access to an institution's website is integral to an increasing number of functions in higher education today. These functions go well beyond online courses and course materials: essential activities such as registration, library services, and testing require online interaction. Moreover, most faculty and staff must utilize digital environments and the institutional web in order to do their work and participate in the mission of the institution.

Given the growing reliance on digital environments, it is essential that all students, faculty, and staff members have the access they need to succeed. This includes those with disabilities who may be dependent on the accessibility and usability of those environments to participate fully in higher education and the activities of their institution. The need for accessibility is gaining further momentum as more persons with disabilities engage in higher education, including returning veterans who now have a disability as well as lifelong learners aging into disability.

Why should accreditation commissions and review teams care?

Providing an inclusive and supportive environment for teaching and learning is a critical part of postsecondary education and a central tenet of the accreditation philosophy. Therefore, accreditors and review teams should support and encourage institutions as they take a leadership role to develop, procure and maintain accessible digital materials and institutional web content.

Web accessibility also maps onto the standards and criteria of all regional accrediting agencies and is in line with many quality improvement plans. It also provides a number of value-added benefits for constituent institutions — most of which can support their reaffirmation submissions:

WEB ACCESSIBILITY AFFECTS STUDENT OUTCOMES:

- » Materials that are natively accessible provide an equivalent educational experience
 - Inaccessible content affects timeliness — putting students at a serious disadvantage during a period in education when just-in-time learning, communities of practice, and critical thinking pedagogies proliferate
- » Accessible materials allow students to be independent in their studies — inaccessible materials can make it impossible to complete their work without help
- » Accessibility enhances learning for other student groups:
 - Those for whom English is a second language
 - Students with different learning styles
 - Multimodal learners (e.g., visual or aural learners)
 - Those using older equipment or in environments where they cannot fully utilize their equipment (e.g., in places where it is difficult to hear or where sound is not allowed, captioned videos can be helpful)

WEB ACCESSIBILITY MAKES SOUND FINANCIAL POLICY:

- » Accessibility is more efficient than after-the-fact fixes.
- » Institutions who do not address web accessibility are at risk for litigation and may run afoul of evolving legislation
- » Institutional web content that is accessible assists in recruitment and retention of students and faculty with disabilities
- » Funding agencies have begun to require accessible information communication for grants and contracts
- » Accessibility enhances collaborative possibilities in both the US and abroad since many require it already
- » Accessibility is good for public relations and development (e.g., campus fund raising campaigns)

WEB ACCESSIBILITY SUPPORTS TECHNOLOGY:

- » Accessible websites often follow current web standards. Thus, these sites are more likely to maintain their integrity as technologies evolve and be compatible with newer browsers and emerging technologies (forward compatible)
- » Accessible content also tends to have a higher return on prominent search engines
- » Web designs that are accessible are usually more robust. This means it should work more reliably across different browsers and devices, such as tablets and mobile phones

WEB ACCESSIBILITY ALIGNS WITH INSTITUTIONAL MISSION STATEMENTS AND STRATEGIC PLANNING INITIATIVES:

- » 86% of institutional mission statements in a national sample contained language supportive of web accessibility. It shows a commitment to quality student outcomes, employee productivity, and supports diversity at all levels (based on a 2008 survey by the GOALS project)
- » An accessible web presence promotes an institution as socially responsible and attuned to the needs of potential users.

How can you help your member institutions?

As representatives of an accreditation agency, you can help your institutions to improve web accessibility (and thus institutional quality) across their systems and we would like to help!

Project GOALS (Gaining Online Accessible Learning through Self-Study) worked with consortium partner SACSCOC (Southern Association of Colleges and Schools- Commission on Colleges) to create resources that can be used by regional accreditors and their constituent institutions to promote these efforts and to leverage accessibility work during the accreditation or reaffirmation process. In conjunction with these institutional resources, Project GOALS also developed a set of materials to be used specifically by review teams and accrediting entities to understand and evaluate evidence of web accessibility during reaffirmation.

Are there any resources that would help your accreditation body or review team? Please *contact us* (<http://ncdae.org/other/contact.php>), we would love to hear from you about materials that you would want us to develop!

A GUIDE TO USING GOALS MATERIALS TO EVALUATE WEB ACCESSIBILITY EVIDENCE DURING AN ACCREDITATION REVIEW

While there are many different methods that review teams can use to evaluate institutional evidence of web accessibility, not all team members may be familiar with the topic. Therefore, Project GOALS has created a set of materials and evaluation guidelines to help review teams understand and evaluate this evidence. These guidelines are based on a set of **Best Practices for Institution-Wide Web Accessibility (Appendix F)** consisting of four Indicators, each focusing on an essential aspect of institution-wide web accessibility. Accreditation review teams may find these materials useful when considering an independent evaluation of institutional efforts to improve web accessibility.

The resource that follows is a quick primer on these materials and how to use them:

Learning About Web Accessibility

To start, you may want to learn a bit about web accessibility and how it relates to accreditation. The article **“Accreditation and Web Accessibility: Why Should Accreditors Care?” (Appendix H)** provides context and highlights the value of web accessibility for the accreditation community.

Armed with this information, you may even want to ask institutions about their web accessibility when starting the review process.

Evaluating Institutional Evidence

UNDERSTANDING THE REVIEWER GUIDANCE DOCUMENTS

As mentioned earlier, the reviewer guidance documents are organized using content aligned with institutional best practices. Thus, you can expect to see four key Indicators of institutional web accessibility – each indicator is made up of a set of Benchmarks. Each Benchmark includes examples of evidence that would support a claim of adherence to that benchmark along with some questions or guidelines for evaluating that evidence. To assess any benchmark, you would review the strength of the statements and evidence presented by the institution.

WHERE TO LOOK

Project GOALS staff have created a template and examples that can assist institutions in organizing their web accessibility work. These materials are structured to align with the layout of the Reviewer Guidance Document making it easy to find the specific areas of guidance necessary. However, not all institutions may use the GOALS structure when including evidence on web accessibility in their portfolios.

A Matrix is available to help find the guidance that is applicable to the evidence you are reviewing. The Matrix lists common areas or aspects of accessibility that may relate to the evidence at hand. For each area, we link to the most likely places to find the appropriate guidance for that evidence.

USING THE REVIEWER GUIDANCE DOCUMENT

Once you have found the appropriate section, you will see examples of common activities and documentation that can support the evidence provided by the institution. Please note that these are common examples but are by no means the only possible types of evidence.

Things to Keep In Mind:

- » Ascertain the goals and overall plan regarding institutional web accessibility. A commitment from the institution in the form of a policy and plan is ultimately necessary for long-term sustainability.
- » You may want to look/ask how the institution is including web accessibility as a component of their portfolio. Some may include this work as part of what they are doing to increase diversity, to improve outcomes for all students, on improving technology across campus, or as part of other initiatives.
- » There are many avenues to successful implementation. While all of the indicators will eventually need to be addressed, some institutions will find that a systematic approach focusing specifically on web accessibility will yield the best results while others may find that incorporating various aspects into existing aspects of their institutional planning may work best for them.

Red Flags

- » Be wary of piecemeal or scattershot work across a campus. While any efforts to improve accessibility are to be lauded, if accessibility efforts are not institution-wide, they will likely be inconsistent and breakdown with changes in personnel and focus.
- » Be skeptical if an institution claims to be fully accessible unless they are engaging in a wide range of accessibility work and have the assessment results to back it up. Engaging in one or two accessibility activities does not make an institution accessible any more than taking a couple of cooking classes makes you a chef.
- » Instituting a policy or plan is useless unless people are actually doing the work. Change only comes through effort, enforcement and ongoing evaluation.
- » Are institutional efforts implemented in timely and logical ways? A policy that is several years old with no updates or a policy with no implantation plan can be indicators of execution issues.
- » Beware of statements that accessibility is handled exclusively through Disability Services. This likely means they are using the Accommodation Model - providing accessibility after the fact rather than ensuring that materials are accessible from the beginning. This creates inequities in timeliness and experience for the students and effects learning outcomes.

Conclusion

As awareness grows and legislation evolves, more institutions will likely engage in web accessibility work. Institutions can capitalize on their efforts by including digital accessibility as part of reaffirmation with their regional accrediting body. Project GOALS has resources for both the institution and accreditation agencies and would like to help. Please visit Project GOALS for more information.

EVIDENCE EVALUATION MATRIX

A Guide to Help Accreditation Review Teams Navigate the GOALS Reviewer Guidance Documents

The following information is designed to assist review teams to navigate the reviewer guidance documents developed by Project GOALS. A matrix follows the introduction with recommendations on where to look in order to find useful information on the varying categories of evidence.

As legislation changes and higher education starts to recognize its importance, institutions are working to improve the accessibility of their websites. Given the scope of work, some may choose to include their web accessibility efforts as part of the reaffirmation process.

Assessing the quality of institutional web accessibility for an accreditation portfolio can be a complex issue. It can be especially challenging when those reviewing materials for quality are not familiar with the topic. Therefore, Project GOALS has developed a set of resources that can be used by review teams and institutions to help them determine the quality of evidence related to web accessibility. A full set of Accreditation Resource Documents is also available on the GOALS website and contains templates, information and additional guidance.

The evaluation guidelines are based on a set of Best Practices for Institution-Wide Web Accessibility consisting of four indicators, each focusing on an essential aspect of institution-wide web accessibility:

- » Indicator 1 - Institutional Commitment
- » Indicator 2 - Planning and Implementation
- » Indicator 3 - Resources and Support
- » Indicator 4 - Assessment

When reviewing evidence, these indicators may provide a good overview of the elements necessary for web accessibility. However, individual documents or sections of evidence may not fit neatly (or obviously) into the indicators above. A greater degree of granularity may be required in order to assess the evidence in context. Therefore, we have developed the following matrix to help you to find the applicable evaluation support for the evidence that you are reviewing.

The matrix lists common areas or aspects of accessibility that may relate to the evidence at hand. For each area, we list the most likely places to find the appropriate guidance for that evidence. Some evidence may be contained within one or two of the links but others may span across several areas.

It should be noted that in order to truly achieve institution-wide web accessibility, addressing one or two issues is not sufficient. For example, an institution cannot claim to be accessible by merely doing some training or creating a policy. However, these actions are good first steps on the road to an accessible web presence.

If the evidence addresses:	You may want to reference:
Policy	Indicator 1 – Benchmark A (leadership) Indicator 2 – Benchmark A (stakeholder inclusion) Indicator 2 – Benchmark B* (policy specifics) Indicator 4 – Benchmark C (ongoing improvement)
Accessibility Planning and Implementation	Indicator 1 – Benchmark A (leadership) Indicator 2 – Benchmark A (stakeholder inclusion) Indicator 2 – Benchmark C* (plan specifics) Indicator 2 – Benchmark D* (implementation) Indicator 4 – Benchmark A (progress evaluation) Indicator 4 – Benchmark C (ongoing improvement)
Resources and Budgeting	Indicator 1 – Benchmark A (leadership) Indicator 2 – Benchmark C (plan specifics) Indicator 2 – Benchmark D (implementation) Indicator 3 – Benchmark B (time and effort) Indicator 3 – Benchmark C (budget)
Promotion and Publicity	Indicator 1 – Benchmark A (leadership) Indicator 2 – Benchmark C (plan specifics) Indicator 2 – Benchmark D (implementation)
Personnel	Indicator 1 – Benchmark B (stakeholder participation) Indicator 2 – Benchmark A (stakeholder inclusion) Indicator 2 – Benchmark C (plan specifics) Indicator 2 – Benchmark D (implementation) Indicator 3 – Benchmark A (hiring and incentives) Indicator 3 – Benchmark B (budget)
Evaluation and Feedback	Indicator 1 – Benchmark B (stakeholder participation) Indicator 2 – Benchmark C (plan specifics) Indicator 2 – Benchmark D (implementation) Indicator 4 – Benchmark B (accessibility outcomes)
Training and Support	Indicator 2 – Benchmark C (plan specifics) Indicator 2 – Benchmark D (implementation) Indicator 3 – Benchmark D* (training and technical support) Indicator 4 – Benchmark C (ongoing improvement)
Purchasing, Procurement and Product Development	Indicator 3 – Benchmark E* (procurement)

**this benchmark is devoted specifically to the issue.*

A GUIDE TO ASSIST REVIEW TEAMS EVALUATE EVIDENCE OF WEB ACCESSIBILITY DURING THE REAFFIRMATION PROCESS

As part of GOALS' continuing efforts to help institutions leverage their web accessibility efforts during accreditation or the reaffirmation process, GOALS has outlined a set of Best Practices for Institution-Wide Web Accessibility and provided a template and examples for documenting web accessibility efforts. However, those materials do not provide guidance on how to determine the quality of the evidence within the template.

This document is a guide to help Accreditation Review Teams to understand and evaluate institutional evidence of web accessibility efforts. These guidelines may also serve to assist institutions in reviewing and enhancing their reaffirmation materials as they are developed.

Using this Document

Reviewers will be very familiar with the accreditation process and the ways in which an institution can provide evidence during reaffirmation. This document is laid out to support your efforts as a reviewer, should an institution include the work of web accessibility during accreditation or reaffirmation. It contains 4 institutional indicators aligned with successful enterprise-wide web accessibility. Each indicator is comprised of benchmark statements. Then each benchmark statement is broken into statements of evidence. Finally, we ask a few questions about the strength of the evidence that may be helpful, particularly if this is a new area for your review, or if you are unfamiliar with the complexities of institution-wide web accessibility.

It should be noted, that while several statements of evidence are provided for each benchmark, an institution would not need to demonstrate conformance to each statement to support adherence to a given benchmark. Moreover, the questions contained under each statement of evidence merely demonstrate the diversity with which institutions could respond. Since they are not necessarily the only options that could support an institutional claim of adherence, reviewers may want to consider other forms of evidence that support the key concept detailed at the benchmark level. However, broader evidence across the evidentiary statements outlined in each benchmark would help confirm an institution's accessibility efforts.

Indicator #1: Institutional Vision and Leadership Commitment

Institution-wide web accessibility is best attained and sustained when there is leadership to support a vision and commitment toward institutional accessibility. This support should come from many levels including an institution's governing board, central administration, and key personnel. Each must actively support, participate, and take ownership in the work and outcomes of accessibility.

Assessment Review Teams might see evidence for this commitment in any number of ways. Two Benchmarks distinguish Institutional Vision and Leadership Commitment. Under each benchmark

are some examples of evidence that would support institutional claims of adherence to that particular benchmark - other evidence may also exist.

BENCHMARK A: THE COMMITMENT OF ADMINISTRATIVE LEADERSHIP

Administrative leadership begins with a vision and commitment toward change. Typically this vision, and its leadership support, stems from efforts made at top administrative levels within an institution. For some systems this would also include the institution's board of governors or trustees. Over time the leadership commitment results in the development and enforcement of an accessibility policy and plan, along with the necessary resources to implement them.

An existing institutional statement of vision or commitment to web accessibility

- » Is the statement explicit that it pertains to web accessibility for persons with disabilities?
- » A definition will help clarify what is meant by web accessibility
- » Is it included in publications that share broader institutional commitment and vision statements?
- » Is it easy to find?
- » Is it publicized and promoted?
- » Does the statement make relevant stakeholders aware of their responsibilities toward web accessibility?

The administration creates and supports a web accessibility task force or institution-wide accessibility group

- » Does the task force membership appear to represent a wide range of perspectives? This might include:
 - Those who will develop and oversee accessibility initiatives
 - Content Developers (e.g., faculty and staff)
 - Web Designers and Programmers
 - Others who will engage in the institution's accessibility work (e.g., Purchasing, HR)
 - Consumers of the end product (i.e., students or staff with disabilities)
- » Is there documentation that this group is charged to recommend or develop initiatives to promote and encourage web accessibility across the institution?
- » Is there documentation that the group is empowered and supported by the administration?
- » Is there evidence that the group is sustainable and ongoing?

An existing institutional policy on web accessibility

- » Is the policy included in central administrative policy documents such as employee handbooks, student government guidelines, or faculty senate rules?
- » Is it published with other policy and position documents?
- » Is there evidence that the policy has been endorsed by the governing board or trustees?
- » Is there evidence that the policy is consistently and appropriately enforced?
- » *(Visit Indicator #2 Benchmark B for guidance on the components of a Web Accessibility Policy)*

An existing institution-wide accessibility action plan

- » If there is an Institutional Web Accessibility Policy, does the plan align with and support the Institutional Web Accessibility Policy?
- » Does the plan link to the strategic goals of the institution?
- » Does the plan include both current and future accessibility efforts?

- » Is the plan is detailed enough to provide a roadmap for those who will be charged with implementing the plan?
- » *(Visit Indicator #2 Benchmark C for guidance on the components of a Web Accessibility Plan)*

The administration makes resources available for web accessibility efforts

- » Is there is evidence of administrative commitment for resources available to web accessibility efforts, such as personnel time, materials or other resources, or budget?
- » Is there is evidence that administration is involved in planning and allocating resources for web accessibility efforts?
- » *(Visit Indicator #3 for guidance on Web Accessibility Resources)*

The administration advances the visibility, promotion, and communication of web accessibility efforts

- » Are statements of the institution’s vision, leadership, and commitment to web accessibility evident (e.g., published and widely available)?
- » Is there documentation of ongoing and consistent communication with faculty, staff, students, and the community outside the institution on web accessibility efforts? If yes, does the communication plan:
 - Reinforce the administration’s commitment to the accessibility plan?
 - Inform stakeholders of their roles in the process?
 - Share status updates?
 - Include upcoming targets, timelines or goals?
 - Encourage feedback and discussion?
- » *(Visit Indicator 2 Benchmark D for more on Communication)*

BENCHMARK B: RELEVANT STAKEHOLDER PARTICIPATION

Including relevant personnel in the planning, implementation, and maintenance of web accessibility provides vital input, fosters ownership across stakeholders, and assists in sustaining the goal of an accessible web presence. Faculty, staff, and students should be included as stakeholders as they are involved in the development, maintenance or use of institutional web content. Stakeholder’s knowledge and ownership of their roles is important, as each will likely have slightly different responsibilities in planning for and achieving overall accessibility. These responsibilities encompass wide-ranging behaviors, including technical staff who design accessible web pages, faculty who identify and upload accessible materials into course management tools, staff who create accessible documents intended for the web, procurement staff who ensure that institutional purchases meet the accessibility standard chosen by the institution, and individuals with disabilities who provide feedback on accessibility outcomes. The participation of all these diverse individuals is an important key for success and underscores the vision and commitment of leadership to the end goal of institution-wide accessibility.

Individuals representing a full range of stakeholders are involved in institution-wide planning and continuous improvement

- » While not all stakeholders will participate in all activities, does the representative group include individuals from:
 - Administrative units?
 - Central IT?
 - Student services?

- The disability resource office?
- Representative faculty and staff members?
- Accessibility specialists?
- Individuals with disabilities?
- Risk management?
- Procurement offices?
- Sponsored programs?
- Human resources?
- Institutional council?

Institutional personnel are engaged in professional development that includes, or is focused on, web accessibility

- » Is there documentation of training and professional development specific to expected roles and responsibilities so each may accomplish their part of institutional web accessibility?
- » Are the following personnel engaged in accessibility training opportunities:
 - Technical individuals (web developers and designers, IT professionals)
 - Faculty (both on campus and adjunct)
 - Staff (who create content that is uploaded onto the web)
 - Students (hired as employees)
- » Is there feedback that training is adequate and appropriate for its purpose of helping the participants fulfill their roles as the institution achieves web accessibility?
- » *(Visit Indicator 3 Benchmarks D for more on Training)*

Faculty, staff and students take responsibility for web accessibility outcomes within their purview

- » Is there documentation that they are aware of their responsibilities and equipped to perform web accessibility activities in their purview? This might be seen in the following:
 - Role statements
 - Training
 - Meeting Notes
 - Reports
 - Memos
 - Communications - official and unofficial
 - Mechanisms for and (the results of) accessibility feedback from students and staff with disabilities
 - The assessment (and results) of web accessibility outcomes across the institution's web presence
- » Is there evidence that many different groups participate in the accessibility work of the institution? This would support a culture of expectation. This might be seen across the following groups:
 - Administrators to support web accessibility efforts across the institution
 - Technical staff involved in designing accessible web pages
 - Faculty who identify and upload accessible materials into course management tools
 - Staff who create accessible documents intended for the web
 - Staff who ensure that institutional purchases meet the accessibility standard
 - Individuals with disabilities who provide feedback on the accessibility outcomes

Systems are available for individuals to provide feedback on the implementation and outcomes of web accessibility

- » Is there documentation that supports multiple feedback systems for web accessibility? These would include feedback and reporting systems for:
 - Members of the accessibility planning committee
 - Faculty and Staff who are charged with implementing accessibility
 - Persons with disabilities who are accessing the institutional web and materials
- » Is there documentation on the amount of use these feedback systems receive?
- » Is there documentation on the promotion of these systems to ensure that the target audiences are aware of their existence and use them?
- » Is there is documentation of the feedback received from these systems?
- » Is there is documentation or a description of how the feedback is used to improve accessibility planning, development and assessment?

Indicator #2: Planning and Implementation

Web accessibility requires strategic planning. Administrators must establish policies and procedures along with a systematic plan to develop, institute, and maintain web accessibility across the organization.

Assessment Review Teams might see evidence of planning and implantation in any number of ways. Four Benchmarks characterize the Planning and Implementation of Institution-Wide Web Accessibility. Under each benchmark are some examples of evidence that would support institutional claims of adherence to that particular benchmark - other evidence may also exist.

BENCHMARK A: THE INCLUSION OF KEY PERSONNEL

Identifying and involving personnel who represent key constituent groups at your institution is essential during both the planning and implementation process. Key accessibility personnel may come from many departments or units and represent disability advocates as well as leaders representing technical, faculty, and staff positions. Administrators identify and include these individuals for input as the institution moves from planning to implementation and maintenance of an institution-wide accessible web presence.

The broader group of stakeholders should also be included as important feedback mechanisms to the web accessibility efforts. Stakeholders are those who are either end users of web content or those who will implement the institution-wide plan. This benchmark can be differentiated from that found in Indicator 1, as the administrative vision exerted to include a variety of stakeholders is different from the actual participation of key personnel representing different stakeholders throughout the process.

The development of the policy and the plan represent two separate bodies of evidence where an institution would include key personnel in the work of web accessibility. However, the properties that enhance the strength of evidence for each are similar. Therefore, we have combined the evidence for both policy and plan (the next two bullet points under the second bullet (Involvement of key accessibility personnel and stakeholder groups in the development of an institution-wide web accessibility plan”)*

***Involvement of key accessibility personnel and those they represent in web accessibility policy.**

***Involvement of key accessibility personnel and stakeholder groups in the development of an institution-wide web accessibility plan.**

- » Is there documentation that a wide array of stakeholders are involved in the development of the accessibility policy / plan?
 - Personnel knowledgeable about web accessibility?
 - Personnel from different departments or units?
 - Disability Advocates?
 - Technology Leaders?
 - Faculty?
 - Staff?
 - Staff or Students who have disabilities that impact web use?
- » Is there evidence that key accessibility personnel work to promote buy-in from the broader stakeholder groups (those represented by the key accessibility personnel as well as end users of web content and those who will implement the institution-wide policy /plan)?

Involvement of key accessibility personnel and stakeholders in the implementation of an institution-wide web accessibility plan.

- » Is there documentation that a web accessibility committee comprised of key personnel led or monitored implementation efforts? (see definition above)
- » Is there evidence that the web accessibility committee is given the necessary authority and support to guide the implementation of the plan?
- » Is there evidence that key personnel are assigned to ensure that the plan is on track and that the work being done conforms to the web accessibility standards as intended (i.e., as specified in either the policy or the plan)?
- » Is there is evidence of efforts made to help departments and personnel meet the requirements set forth in the policy

BENCHMARK B: A COMPREHENSIVE ACCESSIBILITY POLICY

A stated policy that provides specific guidelines and standards for web accessibility is necessary in order to ensure all administrators and stakeholders understand what is required of them. The web accessibility policy should appear in the same set of governing documents as other institution-wide policies, rather than as a separate unit. Once established, the institutional policy should be promoted and enforced.

It should be noted, that while a given policy may not contain all of the elements listed below, these elements provide added strength to the comprehensiveness and utility of an accessibility policy. It is also possible that, due to the structure and framework of the policy system at a given institution, some of the elements may be found in overarching policy documents or elsewhere in the system and should still contribute to the merit of the policy.

Elements of a comprehensive policy on web accessibility include:

A summary statement of the policy

- » A summary statement may:
 - Explicitly state the rationale for the policy?
 - Describe expected outcomes?
 - Establish when key steps are to be completed?
 - Outline how these steps will be achieved?

Effective date(s) for the policy

- » Is the date the policy comes into effect stated?
- » If the implementation is phased, are all critical dates listed?

The scope of the policy

The scope may:

- » Explicitly identify which web content falls under the scope of the policy? Examples would include:
 - Public facing web pages (e.g. the institution's home page and informational pages)
 - Institutional Systems Content (e.g. registration, LMS, financial systems?)
 - Course materials
 - Distance Education
 - Legacy Pages
 - Student pages
 - Alumni pages
 - Community activity pages (e.g. athletics, fine arts, extension etc...)
- » Outline a protocol for pages not under the main institutional domain (e.g. alumni pages or student content in some institutions)?
- » Explicitly identify web content that is exempt from the policy?
 - Does it identify those who can authorize exceptions?
 - Does it describe the process for obtaining exemptions?

A recognized technical standard for web accessibility (e.g., Section 508 or WCAG 2.0 AA)

- » Does the policy identify the technical standard to which all included web content must conform?
- » Is the technical standard recognized and sufficiently stringent to ensure functional web accessibility? (Information on choosing a technical standard)

A provision for procurement, contracting, and collaborative resources

The procurement specifications may:

- » Include a provision for procurement (i.e., purchase, license, or contract) for accessible materials and content?
- » Affirm that accessibility should be a factor in purchases, licensing agreements, requests for proposals, or other contracts?
- » Include provisions for the procurement of accessible goods, services and contracts that will impact:
 - Content creation and delivery tools?
 - Authoring tools?
 - Course or learning management systems?
 - Student, financial and administrative tools?
 - Course resources that are shared but originate from other institutions?

- Products developed by the institution?

Consequences for non-conformance to the policy

- » Does the policy include statements detailing the consequences when the policy is not followed?
 - Note : these statements can be included in the policy, or referenced in other governing documents

Mechanisms for ongoing review

A review procedure may:

- » Include mechanisms to review and assess the appropriateness of current measures and make adjustments as necessary?
- » Outline the frequency of this review process?
- » Define a system for review and revision?
- » Identify those responsible for the review and revision of the policy?

BENCHMARK C: A COMPREHENSIVE WRITTEN ACCESSIBILITY PLAN

An institution-wide effort requires a systematic plan of action. This plan includes strategies for all aspects of implementation including: goals, timelines, budgeting, materials, personnel, ongoing assessment, and, when necessary, revision of the plan. For institutions that require a business plan for use during cycles of continuous improvement, these elements can serve as the basis for a prospectus that includes concept, marketing, position and market analysis, financial planning, and implementation.

It should be noted, that while a given plan may not contain all of the elements listed below, these elements provide added strength to the comprehensiveness and utility of the plan.

Elements of a Comprehensive Plan include:

An executive summary of the plan

The summary might contain

- » A clear overview?
- » Benefits or market advantages?
- » Key points of the plan?
- » Important dates and milestones?
- » Stakeholder responsibilities?
- » Expected outcomes?

A provision for benchmarking and market evaluation

The plan could include

- » Provisions for evaluating websites of exemplar institutions and other relevant sites?
- » Strategies for comparing against best practice?
- » Methods of highlighting exemplars of good accessibility strategies?
- » Systems for identifying and avoiding accessibility pitfalls?

A provision to gather baseline information

Are there guidelines to

- » Conduct a baseline evaluation of the institutional web?
 - How much data will be collected (e.g., a 5% sample)?
 - Where it will be collected (e.g., across all parts of the institutional web)?

- What data will be collected (e.g., pass/fail per page or detailed by standards and criteria used)?
- How will it be gathered and analyzed (e.g., automated tools, manually, blended)?
- Who is responsible to gather the baseline and on what timeline?
- » How the baseline data will be used in the future to evaluate accessibility progress and aid in necessary modifications?

Identification of existing institutional challenges and risks

Are there strategies for

- » Assessing challenges and risks to implementing web accessibility across the institution?
- » Overcoming the challenges and risks that are identified?
- » Identifying and mitigating unforeseen challenges and risks as they are discovered?

Identification of existing institutional priorities

Does the plan identify

- » Ways that web accessibility can fit into existing institutional priorities (e.g. the redesign of the institutional web site, training initiatives for faculty and staff, hiring exceptional employees, strategic planning initiatives, and the accreditation or reaffirmation process)?
- » Ways to leverage existing initiatives that can promote successful accessibility implementation?
- » Provisions to assess any emerging institutional priorities for potential synergy with web accessibility efforts?

A process to communicate and market the plan to the campus and other communities

The plan might outline

- » Who the communications will target?
- » How all relevant stakeholders will be informed of the institutional effort?
- » What will be communicated?
 - This should include information on what will be expected of the various stakeholders - with sufficient information to help them understand and perform their roles in the process
- » When and how often communications will occur?

A provision for budget items appropriate to accomplish the plan

The plan should include

- » A budget adequate to accomplish the goals outlined in the plan?
- » Provisions for the funding of all aspects of the plan? These can include:
 - Start-up costs
 - Personnel
 - Training
 - Materials
 - Licenses
 - Equipment and Software
 - Consultants
- » A plan for assessing the adequacy of the budget?
 - If the budget is not sufficient, is there a strategy to help supplement or augment it?
- » Guidelines for responding to any significant budgetary changes?

Metrics, milestones, and measurable steps

Does the plan identify

- » Short term activities?

- » Long term objectives?
- » Explicit expectations for personnel and stakeholder groups?
- » Detailed descriptions of the benchmarks and metrics to be used to measure progress?

A timeline for rollout of the milestones and measurable steps

Does the timeline provide

- » Specific dates (or date ranges) for all significant milestones and goals to be achieved across the project?
 - These dates should be realistic and achievable for the given milestones
- » Target dates that work in conjunction with the dates for conformance specified in the institutional web accessibility policy?

The assignment of specific responsibilities

Does the plan identify

- » The names or positions of those responsible for carrying out different aspects of the plan?
 - Are critical elements of the plan assigned to individuals with the expertise to carry out those responsibilities?
 - Is sufficient time and resources allocated for these personnel to accomplish assigned responsibilities including additional duties such as meetings of the web accessibility team, inter-disciplinary coordination, and training?

An education plan for staff, faculty and students

The plan might outline

- » Mechanisms for educating, training, and support of those who will be involved in the web accessibility plan?
 - Those who will develop and oversee accessibility initiatives?
 - Content developers (i.e., faculty, staff, and student employees)?
 - Web designers and programmers?
 - Others who will engage in the institution's accessibility work or with specialized roles or responsibilities?
- » Decisions for how training will occur?
 - Will it be embedded in existing training events?
 - Will it be new specialized training programs?
 - Will it be a hybrid of new and existing schedules?

An institution-wide plan to obtain and use feedback

The plan might include

- » Mechanisms to gather feedback from consumers (e.g. faculty, staff, students and community members with disabilities)?
- » Mechanisms to gather feedback from those who are expected to implement the accessibility plan (e.g. staff, faculty, technology staff, procurement officers and human resource staff)?
- » A specification that all feedback will be used in a timely manner to improve web accessibility outcomes and processes?
- » An outline of how these mechanisms will be publicized
 - Published outlines of how feedback is solicited
 - An outline of how feedback summaries will be publicized
- » Provisions for utilizing feedback data in an ongoing and dynamic way?

A plan to monitor the progress of accessibility outcomes

The plan might specify

- » Details such as how the plan will be monitored?
- » Who will do the monitoring?
- » A schedule for when the monitoring will take place?
- » What will be monitored?

An explicit strategy to evaluate and revise the plan in an ongoing way

The plan should include

- » A stipulation that evaluation and monitoring will continue once its original objectives have been achieved?
- » A strategy for ongoing evaluation at regular intervals to ensure that the institution maintains or improves its level of accessibility?
- » Provisions to address changes in technology, evolving standards, and procedures in the future?
- » A plan to use data from regular assessments to revise the current plan and address emerging needs?
- » The personnel who will be responsible for this ongoing evaluation and monitoring?

BENCHMARK D: THE IMPLEMENTATION OF THE WRITTEN PLAN

Once the accessibility policy and plan are in place, administrators and others put that plan into action, ensuring it stays on track by continually monitoring and assessing its progress.

Meeting minutes of the accessibility team/task force

- » Do the meetings address implementation of items outlined in the accessibility plan?
- » Do the meeting notes serve as their purpose a record of progress for the institution's plan?

Documentation of baseline information or reference (starting) points

- » Does collection of the baseline documentation follow (or exceed) what was included in the accessibility plan? Information may include:
 - An accessibility audit of a sample of an institution's web pages
 - An assessment of personnel training in web accessibility
 - Reports from Disability Resources on the number of requests from students who need digital accommodations or access.
 - Information on how institution-wide challenges and priorities relate to the institutional work on web accessibility.
- » Are baseline information or reference points available?
- » Do reports or evaluations provide enough information to be able to measure progress from the baseline levels noted?

A budget sufficient to support institution-wide accessibility efforts

- » Does the budget conform to (or exceed) the budget as outlined in the accessibility plan?
 - Does it cover personnel?
 - Does it cover infrastructure?
- » Will this budget help the institution engage in their current phase of web accessibility efforts (e.g., plan, implement, sustain)?
- » Visit Indicator 3 Benchmark C for more guidance on Budget

Committed efforts by administration, faculty and staff to sustain web accessibility

- » Are there records or reports on the activities of administration, faculty and staff to show current support for web accessibility?
- » Are web accessibility activities in line with the various responsibilities outlined in the accessibility plan or elsewhere?
- » Is there documentation that those tasked with responsibilities are performing their required assignments?
- » Is there information on the effectiveness of these activities?

Communication and marketing of the accessibility plan across campus and beyond

- » If communication and marketing are included in the written plan, do actions match (or exceed) what is covered in the written plan?
- » Other issues to consider whether communication is included in the written plan or not:
 - Is the accessibility plan published and easy to find?
 - Is there evidence that information about the plan is widely disseminated to all relevant parties?
 - ◊ Those who will develop and oversee accessibility initiatives?
 - ◊ Content Developers (i.e., faculty and staff)?
 - ◊ Web Designers and Programmers?
 - ◊ Others who will engage in the institution's accessibility work?
 - ◊ Consumers of the end product (i.e., those with disabilities)?
 - ◊ Other members of the institution's community (locals, alumni, student groups etc...)?
 - Is information customized for the different groups? (see above)
 - Are multiple information streams used to get the communication and marketing messages out? (options include but are not limited to email, newsletters, reports, webpages)
 - Is there documentation that the information provided helps the different groups understand and perform their required tasks?

Data on web accessibility training for personnel

- » Is the training in line with (or better than) the accessibility plan?
- » Is there evidence (through training dates, personnel involved, or evaluations) that training was offered to differing groups of relevant personnel in line with the plan?
- » Visit Indicator 3 Benchmark D for more guidance on training

Documentation of implementation progress

- » Is there evidence that progress of the implementation plan is tracked? These could be found in reports or other documents including:
 - Implementation Reports
 - Metrics and Milestone achievements
 - Results from Benchmarking Tools
 - Adherence to the timeline
 - Marketing and Education communications
 - Web Accessibility Outcomes
- » Does it provide an understandable picture of the institution's progress with the plan?
- » Is progress in line with that laid out in the institution's accessibility plan?
- » Visit Indicator 4 Benchmark A for more guidance on Implementation progress

Documentation on the feedback from different levels of implementation

- » Do feedback collection systems follow (or exceed) those outlined in the accessibility plan?
- » Are there feedback systems available for the different stakeholders? This should include:
 - Members of the accessibility task force and others involved in developing and overseeing the accessibility plan
 - Faculty and Staff who are charged with implementing accessibility
 - Persons with disabilities who are accessing the institutional web and materials
- » Is there documentation that the systems are publicized to the appropriate stakeholders?
 - Are these promotions effective? Do the users know about the systems?
- » Is there evidence that the systems are used by their stakeholder groups?
- » Is there documentation that the feedback is used to make changes to the plan and to address issues?

Indications of actions taken for nonconforming web content

- » Are the consequences for non-conformance published as part of the policy or plan widely known?
- » Is there evidence that the institutional web accessibility policy is enforced?
- » Is non-conformance identified across the institution's web presence?
- » Is there evidence that consequences for non-conformance are consistently upheld and enforced?
 - Are there records of assessments and actions taken?
 - Are assessments and actions taken in line with the accessibility plan?

Web accessibility outcome data

- » Is there documentation that outcome data (i.e., the actual web accessibility of institutional pages) has been collected?
 - Is data collection ongoing?
- » Does the collection of data meet (or exceed) that prescribed by the accessibility plan?
- » Is the collected data compared to the expected outcomes
 - Of the Institutional policy?
 - Of the technical standard?
 - Of plan milestones?
- » Are the results of the outcome data used to make changes and alleviate issues?
- » Visit Indicator 4 Benchmark B for more guidance on Outcome Data

Indicator #3: Resources and Support

An institution-wide web accessibility plan requires adequate resources and support. Administrators must provide the resources necessary to implement the web accessibility plan with provisions to ensure that the system is sustainable and will remain accessible.

Assessment Review Teams might see evidence for this commitment in any number of ways. Five Benchmarks support the adequacy of Resources and Support required for Institution-Wide Web Accessibility. Under each benchmark are some examples of evidence that would support institutional claims of adherence to that particular benchmark - other evidence may also exist.

BENCHMARK A: FOCUS ON PERSONNEL

An effective plan cannot be carried out without personnel who have the expertise to implement it. Make sure you focus on hiring, retaining, and supporting personnel at all levels who will help your institution attain its accessibility goals. For example you need to have technical individuals, and those with special responsibilities, to implement the web accessibility plan. Moreover, typical faculty and staff have multiple responsibilities that require their time and attention. Therefore, it is important to provide them with clear and helpful information, sufficient time and support, and the motivation or incentives to ensure that they give the accessibility work in the plan the necessary attention.

Position announcements for individuals that include requirements for accessibility experience or knowledge

- » Is web accessibility knowledge or experience explicitly stated in technical position announcements?
- » Do the announcements specify a level of skill or experience with web accessibility?
- » Do all technical announcements include web accessibility?
- » Are web accessibility expectations included in announcements for other relevant personnel as appropriate to their role? e.g.:
 - Administrators who will support web accessibility efforts across the institution?
 - Faculty who will identify and upload accessible materials into course management tools?
 - Staff who will create accessible documents intended for the web?
 - Staff who will ensure that institutional purchases meet the accessibility standard?

The presence of incentives and motivators for faculty and staff participation in accessibility efforts

- » Is there documentation of institutional incentives for those participating in web accessibility work? These can include:
 - Recognition of individuals/groups/departments for compliance or exceeding requirements?
 - Inclusion of web accessibility work in promotion and tenure portfolios?
 - Other extrinsic rewards (e.g. bonuses, products, award dinners etc...)
 - Sanctions if work does not comply with requirements or is not achieved in a reasonable time with support and assistance?

The collection of data on retention rates for personnel key to accessibility implementation

- » Is there documentation on the retention rates for key accessibility personnel? These can include:
 - Web accessibility task force committee members
 - Web developers
 - Procurement specialists
 - Those who train faculty and staff in web accessibility practice
- » Is there documentation of efforts made to retain key accessibility personnel?
- » Is there information that retention data is used to improve retention of key personnel?
 - To make adjustments to the accessibility plan?
 - To understand and identify problems?
 - To improve retention of key accessibility personnel?
- » Is there documentation on steps taken to ensure that essential knowledge or understanding of the plan is retained during personnel transitions?

BENCHMARK B: SUFFICIENT TIME AND EFFORT ALLOCATED TO PERSONNEL

The process to move to an accessible web presence takes time. Both the time and effort required for this work should be identified when allocating faculty and staff responsibilities.

The recognition of accessibility work in job descriptions and role statements

- » Is web accessibility included in all relevant job descriptions and role statements?
- » Is the web accessibility work outlined in job descriptions or role statements appropriate to the efforts that are expected of the individual?
 - Administrators who will support web accessibility efforts across the institution?
 - Faculty who will identify and upload accessible materials into course management tools?
 - Technical staff who will be involved in designing accessible web pages?
 - Staff who will create accessible documents intended for the web?
 - Staff who will ensure that institutional purchases meet the accessibility standard?
 - Individuals with disabilities who will provide feedback on the outcomes?
- » Do all appropriate job descriptions and role statements include web accessibility?
 - Less than a third?
 - Between one third and two thirds?
 - More than two thirds?

The recognition of accessibility work in personnel time and effort reports

- » Is web accessibility reflected in the relevant staff's time and effort reports? e.g.:
 - Web developers?
 - Disability support personnel?
 - Purchasing?
 - Human resources?
 - Sponsored programs?
 - Faculty?
 - Staff?
 - Training personnel?

The collection and use of feedback on the sufficiency of personnel allocation for web accessibility efforts

- » Is there evidence that feedback on personnel allocation was requested during the development stages of the web accessibility plan?
 - Was feedback collected from a variety of stakeholder groups?
 - Was that feedback used to inform the web accessibility plan?
- » Is there documentation of feedback systems in place to determine if personnel allocation is sufficient to conform to the accessibility plan?
 - Is feedback collected from all impacted stakeholder groups?
 - ◇ Web developers?
 - ◇ Disability support personnel?
 - ◇ Purchasing?
 - ◇ Human resources?
 - ◇ Sponsored programs?
 - ◇ Faculty?
 - ◇ Staff?
 - ◇ Training personnel?

- » Is there evidence that feedback on personnel time and effort is used to ensure adequate allocations for the plan?

BENCHMARK C: A BUDGET SUFFICIENT FOR INSTITUTION-WIDE EFFORTS

Administration should take financial requirements into account when developing the written accessibility plan and design budgets accordingly. Necessary materials, licenses, equipment, personnel, and training should be considered. The funding necessary to sustain accessibility of the system should also be factored into the budget.

Feedback or reporting that outline the sufficiency of available web accessibility resources

- » Is there evidence that feedback is collected from key personnel and those involved in the implementation of the plan?
- » Is feedback (e.g. email, reports, meeting minutes) available on the sufficiency of web accessibility resources?
- » Does the feedback cover key resources needed for the plan to succeed? This might include budget or resources such as
 - Personnel time and effort
 - Training
 - Technical assistance and support to staff
 - Necessary equipment, licenses, materials, startup costs etc...
- » Are the reports used to make adjustments?
 - To the web accessibility plan?
 - To the budget?
- » Is there evidence that evaluations and adjustments to the budget are sustained and ongoing?

A review of reports and statements monitoring the use of accessibility resources

- » Is there documentation that web accessibility resources are monitored?
- » Is there evidence that feedback data collection is sustained and ongoing?
 - Is the information used to adjust the budget as necessary?

BENCHMARK D: TRAINING AND TECHNICAL SUPPORT

All personnel (i.e., faculty and staff) should be provided with the knowledge, support, and materials they require to carry out their roles in implementing institution-wide web accessibility.

Trainings for faculty, staff, and students which occurs in conjunction with their expected accessibility roles

- » Is there documentation that web accessibility training is offered for different groups who have a role in web accessibility? Examples would include:
 - Administrators who support web accessibility efforts across the institution.
 - Technical staff who are involved in designing accessible web pages.
 - Faculty who identify and upload accessible materials into course management tools.
 - Staff who create accessible documents intended for the web.
 - Staff who ensure that institutional purchases meet the accessibility standard.
 - Accessibility leads who provide support and training for others.

Technical assistance and support that is available to, and used by, faculty, staff, and students

- » Are technical assistance and supports available to those who are part of the institution's work on web accessibility? (This may be formally documented, advertised, or just part of IT help desk functions)
- » Do the supports occur in various forms? Examples include:
 - Professional development workshops?
 - Conferences?
 - Help Lines?
 - An on campus Help Center?
 - Consultants?
 - Communities of practice or discussion forums?
- » Is there evidence that those that need technical assistance know that it is available?
- » Is there evidence that technical assistance is being used by those involved in web accessibility?

The presence and adequacy of materials necessary to support training, technical assistance, and implementation

- » What types of supports are available to those who will provide training and technical assistance to others? Examples might include:
 - Opportunities for their own training?
 - Opportunities for their own technical assistance?
 - Technical resources?
 - Accessibility evaluators?
 - Assistive technologies used for testing?
 - A technology lab that can be used to test for accessibility?
- » Is there evidence (via documentation or discussion) that feedback is periodically solicited from this group of individuals regarding the sufficiency of the resources they have to conduct their duties (i.e., train and support others in web accessibility).
- » Are materials tailored to support different levels of knowledge and different personnel roles?
- » Is there evidence that those involved in web accessibility activities have utilized the materials?
- » Is there any information that indicates that trainers and technical support personnel find that the materials are sufficient and useful?

BENCHMARK E: THE PROCUREMENT, DEVELOPMENT, AND USE OF TECHNOLOGIES THAT WILL RESULT IN ACCESSIBLE WEB CONTENT

To create and maintain an accessible web architecture, personnel should choose tools that possess or render accessible web content. Failing to procure or develop accessible technologies perpetuates new and existing problems. A strong procurement policy, with language included in contracts, helps ensure that personnel use the institution's resources wisely and that products are purchased in line with institution-wide web accessibility efforts. This includes programs such as open source, shareware, and freeware that don't go through the traditional procurement process.

Accessibility procurement language that is included in contracts, is consistent with the institutional standard, and used as part of the selection process for purchasing

- » Is there documentation that accessibility language is included in procurement contracts and requests from vendors?

- Does the language include the institution's chosen technical standard to be met?
- » Do all types of digital product and service requests and contracts include an accessibility requirement? Examples would include
 - Content creation and delivery tools.
 - Authoring tools.
 - Course management tools.
 - Student registration and financial tools.
 - Campus financial and human resource tools.
 - Other acquisitions that don't go through the traditional procurement process (e.g. open source, shareware, and freeware).
- » Is there documentation that accessibility is a factor in purchasing decisions?
- » Are there mechanisms to evaluate and ensure the vendor's accessibility claims?
- » When accessible products are not available is there documentation the institution purchases products that conform closest to the institutional standard?
 - Is there documentation that in cases when the institution purchased a product or service that did not meet their accessibility standard, did they require that the vendor improve the product over time?

Accessibility requirements for course resources that are shared but originate from other institutions or organizations

- » Is there documentation that the institution's technical accessibility standard is required when the institution engages others in shared content and teaching (e.g., signs a collaborative agreement for online learning by another institution) ?
- » Is the requirement applied consistently across all collaborative agreements?

Products that are developed by the institution meets the institution's stated accessibility standard

- » Do web products developed by the institution, or in conjunction with the institution conform to (or exceed) the institution's technical standard?

Indicator #4: Assessment

Ongoing assessment is necessary to ensure that your web accessibility plan is working and on track. Processes must be in place to measure progress, constituent satisfaction, and outcomes. This information is then used to help determine the sustainability of the current efforts and make improvements to the overall program.

Assessment Review Teams might see evidence of assessment in a number of ways. Three Benchmarks illustrate the Assessment Necessary for Institution-Wide Web Accessibility. Under each benchmark are some examples of evidence that would support institutional claims of adherence to that particular benchmark - other evidence may also exist.

BENCHMARK A: EVALUATION OF IMPLEMENTATION PROGRESS

Provisions are made to ensure that the plan is implemented as intended (e.g., scope, training and support of staff, timelines). Progress is monitored and evaluated to ascertain if implementation is occurring at predicted levels, and that alterations in planned implementation are identified and communicated.

The collection and analysis of data or information of an institution's progress within the implementation process

- » Is information collected on the institution's progress in implementing the accessibility plan?
 - Are key components of the plan included in data collection and analysis?
 - Does the process of evaluating the implementation include whether or not milestones are being met by dates set by the institution?

Formal reports on the progress of the intended implementation plan

- » Does the institution create formal reports on implementation progress?
- » Do the reports detail information from a variety of sources or viewpoints?
- » Are the reports communicated to the intended audiences?

Informal summaries or communications on the progress of the implementation plan

- » Are there mechanisms in place to share informal information on the progress of the institution-wide implementation (e.g., through email, meeting minutes, short summaries or other correspondence?)
- » Is there any evidence that this informal information is used to resolve problems before they become critical?

BENCHMARK B: EVALUATION OF WEB ACCESSIBILITY OUTCOMES

No plan or policy is useful if it does not result in the intended outcome. Those tasked by the institution to improve web accessibility must periodically monitor and evaluate its status to determine if it is meeting the institution-wide web accessibility standard. Because automated web accessibility tools don't provide a complete assessment picture, key accessibility personnel should include manual checks in their evaluation plans. As technology and standards change over time, it is also important that the institution determine if the stated outcome is sufficient or if alterations could bring it more in line with current standards and practices.

Institutional web accessibility data

- » Is there documentation that the actual web accessibility of institutional pages is collected and analyzed?
 - Is accessibility being assessed to the institutional standard?
 - Is there representation across different parts of institutional web?
 - Is the sample of adequate size and diversity to make a determination?
- » Do data collection methods include both automated and manual checking (i.e., some elements can't be detected automatically, thus manual checking is strongly advised as part of the evaluation)?
- » Is data collection ongoing?

Institutional reports containing web accessibility data or summaries

- » Does the institution create reports, or summaries contained in other reports, that represent periodic institutional accessibility data as it is collected?

Reports from external evaluations of web accessibility (not necessary at all institutions)

- » If there was there a review or accessibility audit by external reviewers (e.g., may include peer institutions, web accessibility groups, or consultants), do reports detail institutional status on actual web accessibility?

Correspondence describing accessibility outcomes

- » Is there any informal or formal correspondence between administrators, key personnel or stakeholders regarding accessibility data or outcomes?

BENCHMARK C: ASSESSMENT RESULTS ARE USED TO IMPROVE INSTITUTIONAL ACCESSIBILITY

Data gathered from evaluations of both the process and the outcomes of web accessibility are of little value unless they are used to improve and inform what is to happen in the future. Those tasked by the institution to improve web accessibility use ongoing oversight and review data sources continually to revise procedures to ensure the institution can create and maintain institution-wide web accessibility. These same data can be used for future changes in institutional policy.

Reports that reflect recommendations for change

- » Are documents available that recommend changes or actions based on assessments and data collected?
 - Note: These documents can be recorded in a range of formats including reports, meeting minutes, or correspondence
- » Is there evidence that information used in the reports came from a variety of sources?
- » Do recommended changes or actions target different aspects of institutional web accessibility?
Examples of different aspects could include the following:
 - Policy
 - Plan Components.
 - ◇ Scope.
 - ◇ Benchmarking.
 - ◇ Communications.
 - ◇ Budget.
 - ◇ Personnel.
 - ◇ Training and Support.
 - ◇ Timelines and Metrics.
 - ◇ Outcomes.
 - ◇ Assessments.
 - Process

Documentation that describes how data sources inform institutional efforts

- » If the institution is in a phase before data collection has begun or is between data cycles, is there documentation on how data sources will inform efforts once data is collected?

ABOUT GOALS

Project GOALS is a 6-member Consortium led by the National Center on Disability and Access to Education (NCDAE) at Utah State University, it includes: Michigan Community College Virtual Learning Collaborative (MCCVLA); Southern Association of Colleges and Schools – Commission on Colleges (SACSCOC); Southern Regional Education Board (SREB); Western Interstate Commission for Higher Education (WICHE); and WebAIM – Keeping Web Accessibility in Mind. The work of the project was supported under a U.S. Department of Education grant (FIPSE), no endorsement should be inferred.

For more information visit www.ncdae.org/goals