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Recommended campus actions to improve accessibility of online education

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TO: CSU Presidents

FROM: Ephraim P. Smith,
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SUBJECT: Campus Accessibility Strategy for Online Education

The CSU Accessible Technology Initiative (ATI) was launched in 2006 to support campuses in delivering university programs, services and activities that are accessible to the entire CSU community irrespective of disability status. Executive Order 926, the CSU policy statement on accessibility states, "*It is the policy of the CSU to make information technology resources and services accessible to all CSU students, faculty, staff and the general public regardless of disability.*" Implementation of this policy is guided by the ATI as described in Coded Memo AA-2013-03 that supersedes all earlier ATI Memos.

The Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973 (504) require that qualified individuals be provided equal access to programs, services, and activities. California Government Code 11135 applies Section 508 of the 1973 Rehabilitation Act, as amended in 1998, to State entities and to the California State University (CSU). Section 508 of the Rehabilitation Act was enacted to promote the adoption and creation of accessible information technology that reduce or eliminate need for costly or time-consuming accommodations.

Campus Responsibilities

Coded Memo AA-2013-03 is intended to help campuses comply with CSU policy and the laws outlined above. Pursuant to this memo, CSU campuses are responsible for developing and maintaining a strategic plan that covers the accessibility of all university functions. This includes the following:

- Positioning accessibility of university programs and services as a campus-wide responsibility (not just that of Disability Services)

- Providing strong executive leadership, support, and accountability for the campus ATI implementation
- Maintaining a strong, well-represented campus ATI Steering Committee with sufficient resources and authority to successfully implement the initiative
- Following the annual reporting cycle of reviewing/updating the campus plan, implementing projects, and documenting progress toward achieving ATI goals
- Ensuring that accessibility is considered at time of adoption, development, or purchase of Electronic and Information Technology products, services and instructional materials including:
  - Selecting and developing products with strong accessibility support that minimize the need for campus accommodations
  - Identifying and planning for known accessibility gaps
  - Driving vendor improvements to accessibility support

Recent Legal Settlements

Accessibility barriers to curricular content and courses are frequently cited in investigations by the US Department of Education's Office for Civil Rights and in case law. For example, in August, 2012, the student disability group at University of Montana filed an OCR complaint alleging numerous accessibility problems with the online course management system and instructional content including:

- Inaccessible live chat and discussion boards in the learning management system
- Inaccessible faculty-prepared class assignments and materials posted online
- Inaccessible scanned documents
- Uncaptioned videos
- Inaccessible library database materials
- Inaccessible course registration through the campus portal
- Inaccessible classroom clickers

In May 2013, UC Berkeley and Disability Rights Advocates—a legal advocacy firm—reached a broad-based settlement regarding accessibility barriers to print materials. UCB agreed to make significant changes to business procedures in order to ensure that students with print disabilities are provided comparable and timely access to print materials used in courses and offered at campus libraries. Some of the key outcomes of this agreement include:

- Shorter timelines for delivering print materials in alternate format (e.g. Braille, audio, eText)
- Providing 'interim services' (e.g. personal readers, extensions of course deadlines) while students are waiting for delivery of alternate format materials
- Providing students an online system to track the status of their alternate media requests
- Remediating the online library catalog software for compatibility with assistive technology used by persons with disabilities
- Developing a library print conversion system to convert library materials into alternate formats

- Providing assistive technology to students in computer labs throughout the campus

Accessibility and Online Courses

As the use of online courses increases, it is vital that campuses incorporate accessibility from inception through implementation. While delivering accessible online courses and content sometimes involves up-front costs, these costs are generally offset by a reduction or elimination of the cost of accommodations. In addition, incorporating accessibility during the design and building of online courses is generally less resource-intensive than remediating or retrofitting an existing course.

The ATI provides several services and resources that support campus efforts to deliver accessible online courses including:

- A systemwide contract for discounted transcription and captioning services
- Systemwide licensing of the Compliance Sheriff web accessibility tool
- Numerous training and awareness resources hosted on the [ATI Professional Development](#) site
- Coordinating monthly Community of Practice meetings to share promising practices and collaborate on common problems
- Providing accessibility consultation for the systemwide Cal State Online initiative

Moving Forward

As campuses begin planning for the upcoming 2013-14 academic year, please take this opportunity to ensure that both new and longstanding leaders on your campus are familiar with the goals of the ATI and actively engaged in campus ATI efforts.

The ATI will be disseminating information regarding the latest ATI Coded Memo, implications of State and Federal law and recent legal decisions, and campus and systemwide resources that support effective campus ATI implementations. Please encourage leaders from Academic Affairs, Information Technology, and Student Affairs to reveiw the information and participate in our ongoing projects and professional development programs.

Please contact the Cheryl Pruitt, ATI Director (cpruitt@calstate.edu) with any questions or concerns regarding this communication.

c: Dr. Timothy P. White, Chancellor, California State University
        Dr. Benjamin F. Quillian, Executive Vice Chancellor and Chief Financial Officer
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