



The New Title II Digital Accessibility Regulations: *What Public Institutions Need to Do Now To Work Toward Timely Compliance*

*Korey Singleton, Ph.D., ATP, RET
Assistive Technology Initiative
Office for Diversity, Equity, and Inclusion*

AHEAD Fall Webinar
October 29, 2024

Session Agenda

- About George Mason
- Trends Impacting Digital Accessibility
- Practical Strategies & Examples for Improving Digital Access
- GMU Approach
- Q&A



About Us

George Mason, ATI, Accessibility

Today's Speaker

Korey Singleton, Ph.D., ATP, RET

*Deputy ADA Coordinator and ATI Manager
Office for Diversity, Equity, and Inclusion*





George Mason University

- Largest public R1 higher education institution in VA (>40k FTE in Fall '23)
 - Online learning, academic programs (grad/undergrad), pathways programs
- Located ~30 minutes from Washington, DC
- *Diversity is our strength!*
 - Student body represents all 50 states and over 130 different countries.
- Registered students with disabilities has grown by 200% in recent years (~7.5%)

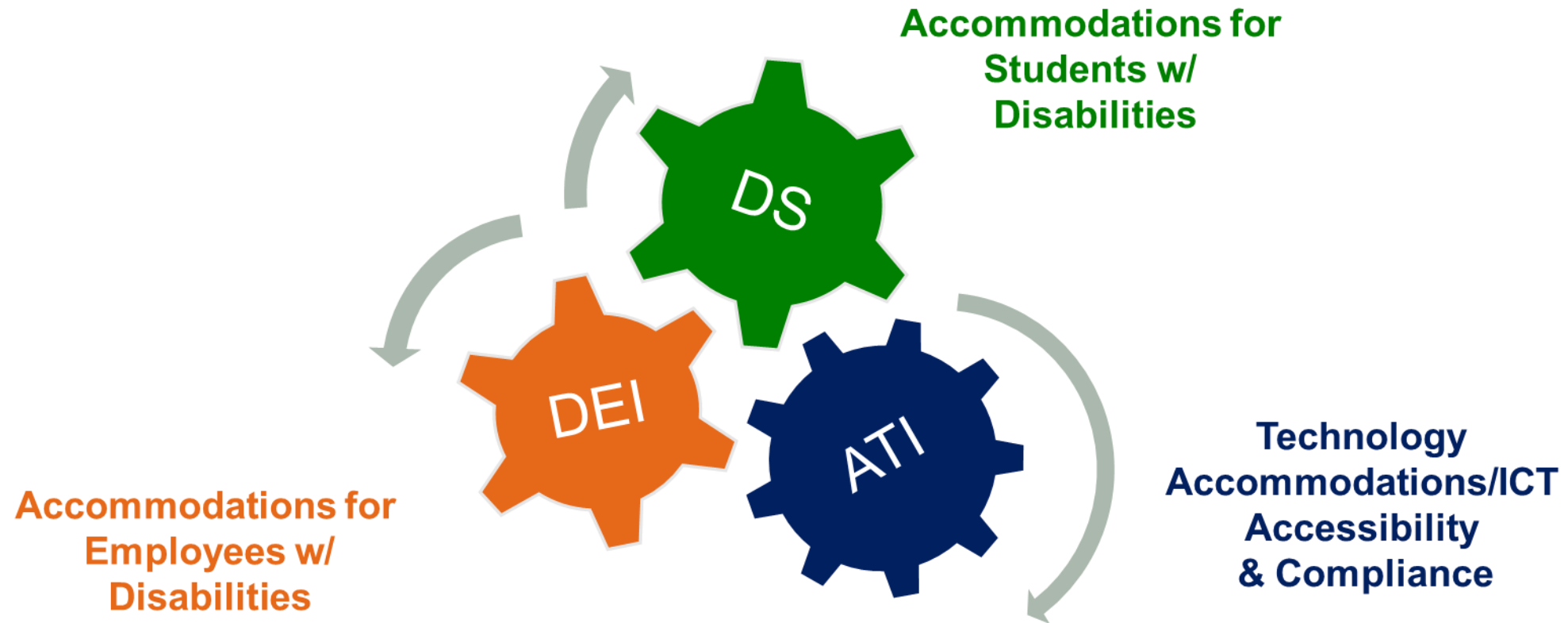


Assistive Technology Initiative

In addition to the *provision of assistive technology resources*, the ATI works to ensure equivalent access to ICT resources for individuals with different learning styles and abilities in the Mason community through *video captioning, web and document accessibility, alternate formats, and training*.



George Mason Accessibility: *A Collaborative Partnership*

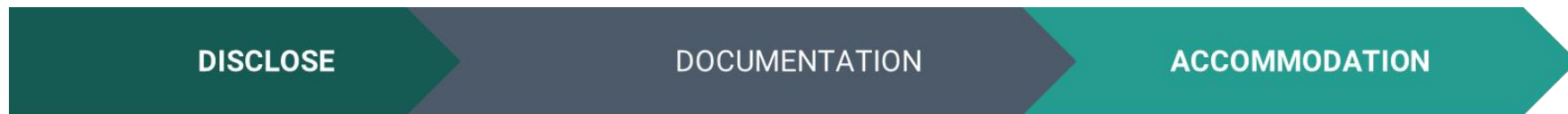


Trends Impacting Digital Access in Higher Ed

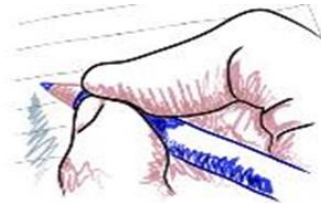
*Medical Model, Settlement
Agreements, Common Issues*

Existing Disability Support Model in Higher Education

“Existing strategies for supporting SWDs in higher education rooted in ‘*medical model*’ (Burgstahler, 2012).”



Extended time



Notetaking support



Interpreter

Takeaway: *Digital accessibility* exposes the limitations of the Medical Model.

Trends & Issues Impacting Digital Accessibility

Higher Ed Trends

- Increasing numbers of students with **disabilities** entering IHE
- Greater implementation of **online/e-learning technologies** in higher education classrooms (online and F2F)
- U.S. Dept. of Education's OCR has entered into over 1300 [resolution agreements against public entities](#) by individuals with sensory impairments (visual and/or hearing loss).

Collective Issues

- Institution websites
- CMS, LMS
- Apps – Enterprise & supplemental
- Captioning for videos
- Document accessibility (Word, PPT, PDFs)
- Library resources (databases, search, print resources)
- [Timely access!](#)

- Adopt Web Content Accessibility Guidelines (WCAG) v2.1, Level AA
- Applies to all websites and mobile apps that a state or local government *provides or makes available*.
- **Web content is defined broadly as** “*the information and experiences available on the web, like text, images, sound, videos, and documents.*”
- **Exceptions:**
 1. Archived web content
 2. Preexisting conventional electronic documents
 3. Content posted by a third-party
 4. Password-protected documents
 5. Preexisting social media posts
- **Compliance Timeline:**
 - April 2026, pop. >50,000
 - April 2027, pop. <50,000

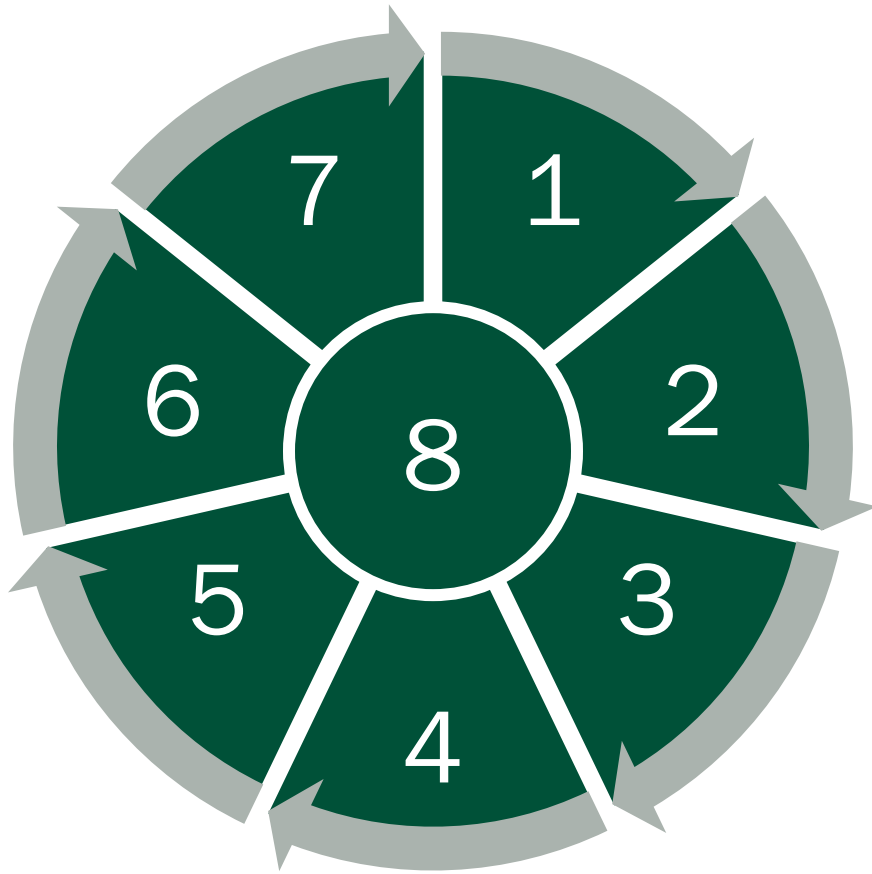
ADA Title II Updates

Released April 24, 2024, [recent updates](#) integrate requirements relating to digital accessibility (*websites and mobile apps*).

Practical Strategies & Examples for Improving Digital Access

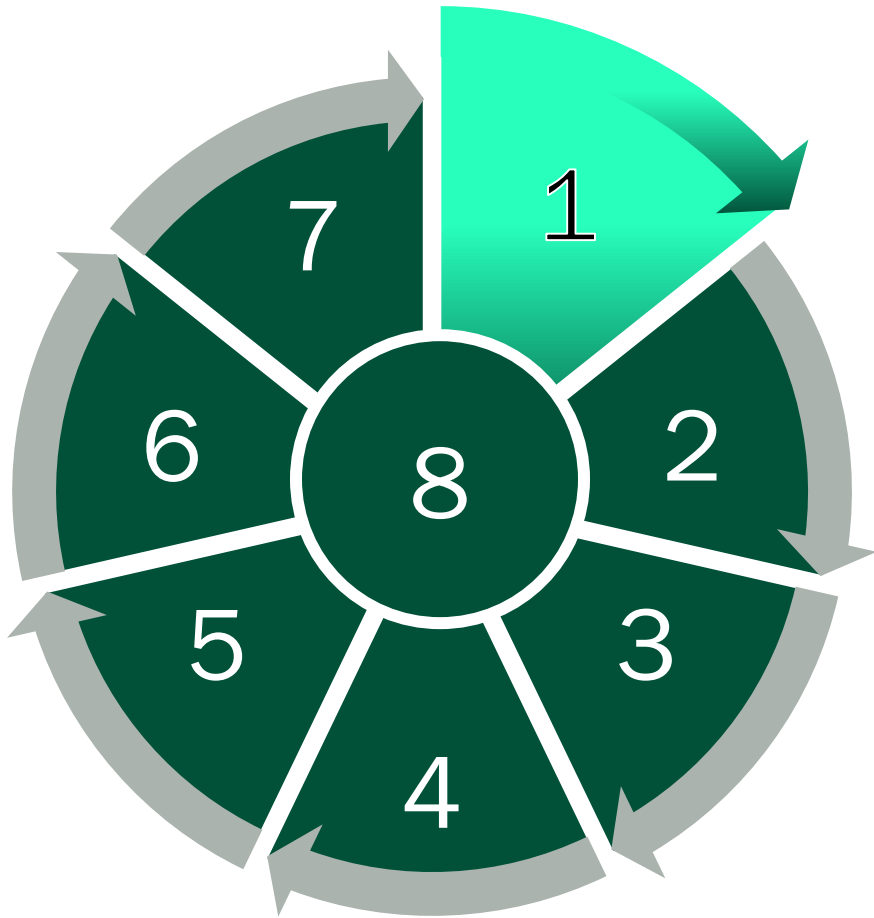
*Takeaways from DOJ/OCR Settlement
Agreements, Consent Decrees, and Dear
Colleague Letters*

Practical Strategies & Examples



- Strategies suggested are from a collective review of several DOJ/OCR settlement agreements, consent decrees, and Dear Colleague letters. *(Note: This list is generalized and not comprehensive.)*
- Including examples which reflect steps taken by George Mason.

Practical Strategy #1



Create a Task Force convening knowledgeable staff to develop a strategic plan around accessibility.

George Mason's IT A11y Working Group (2013)

Issues

- National cases had Mason equivalents
- University's ICT infrastructure was changing

Stakeholders

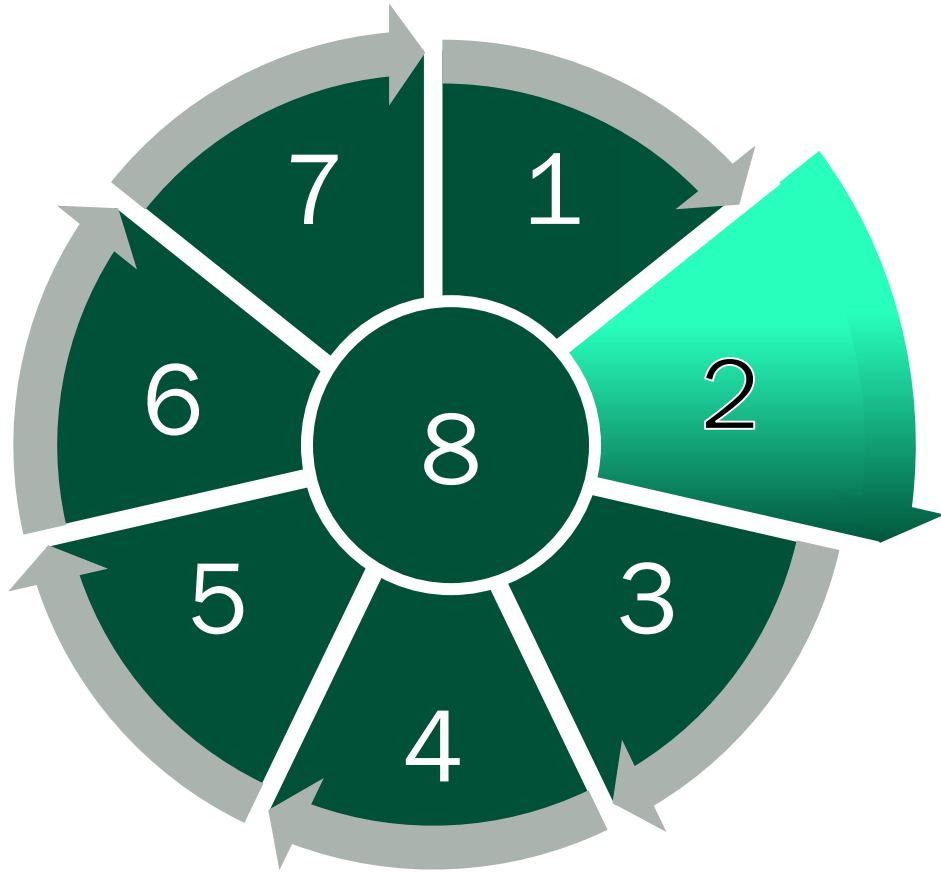
- Library, University Life, ITS, Stearns Center, Legal, Academic Depts., DS, and DEI

Established Next Steps

- Laid groundwork for everything that we have done over the past decade.



Practical Strategy #2



Adopt an accessibility standard
(e.g., WCAG 2.0, WCAG 2.1,
WCAG 2.2, etc.).

Create Digital Accessibility Policies and Procedures

Policy Considerations

- Purpose
- Ownership
- Resources
- Scope
- Definitions
- Implementation
- Violations
- Resources (e.g., *training, staffing, process, procedures, etc.*)

Sample Policies

- [Harvard University](#)
- [Stanford University](#)
- [University of Illinois](#)
- [University of Washington](#)
- [Michigan State University](#)

Vendor Example: *Pressbooks Accessibility*

PB PRESSBOOKS

Pressbooks Reading Interface

Accessibility Conformance Report WCAG Edition

(Based on VPAT[™] Version 2.4)

Name of Product/Version: Pressbooks 6.7.0 & McLuhan 2.26.0

Report Date: February 2023

Product Description: Pressbooks is a free and open source book content management system that allows users to publish books to the public web and produce exports in multiple formats, including EPUB and PDF. Pressbooks is built on top of WordPress Multisite but makes significant changes to the admin interface, web presentation layer and export routines of a standard WordPress installation. Pressbooks is typically installed with a suite of complementary plugins and themes which extend the tool's default publishing capabilities.

Contact Information: accessibility@pressbooks.com

Evaluation Methods Used: Testing was conducted by the Inclusive Design Research Centre at OCAD University and Pressbooks staff. Testing was done on the following browsers: Firefox 105, Safari 16, and Chrome 109. Tools used for testing include: NVDA 2022.4 screen reader, VoiceOver screen reader, WebAIM Wave Toolbar, Nu HTML checker, ARC Toolkit, TPG Color Contrast Analyzer.

Remarks and Explanations: See our organization's accessibility commitments and find the latest versions of our VPATs at <https://pressbooks.com/accessibility/>. If you encounter any accessibility issues with our software that are not described in our VPATs, please report them in the relevant [GitHub repository](#) or via the contact info provided above.

- *Accessibility Conformance Reports (ACRs) or Voluntary Product Accessibility Templates (VPATs)* offer great incite regarding accessibility of resources.
- *Technical standards* being adopted.
- *Contact Information* if you encounter issues.
- Accessibility testing audit/priorities (i.e., *testing tools used*).

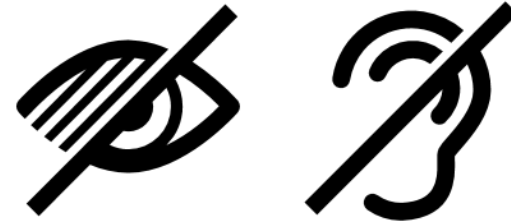
Practical Strategy #3



Create policies and procedures to address both existing content and functionality, as well as new or updated online content or functionality that is published, developed, procured, or used.

High Risk/High Impact Approach (Targeted)

- **Collaboration with Disability Services**
 - Focused on proactively addressing needs of students with sensory impairments (i.e., 120+ students)
- **Collaboration with Stearns (Digital Learning)**
 - Accessibility integrated in the online course development process
- **Collaborations with ITS (Learning Support Services, Web Admin)**
 - LMS, CMS
- **Accessibility-As-A-Service Support**
 - Document remediation, web accessibility, *post-production* captions, transcripts, and AD for instructional and public-facing videos





Choose “**accessible**” apps, resources, and platforms.



Provide **alternative text descriptions** for all *meaningful* images.



Provide **accurate, synchronized captions** for video.



Use **good color contrast**.



Use **clear layouts and document structure** (e.g., headings, reading order).



Use **simple tables** (i.e., one row and one column for headers).



Use **descriptive hyperlink text** (when possible, avoid terms like “*Click here*” or “*Learn more*”).



Use **sans serif fonts** (e.g., Calibri, Arial).



Use **accessibility checkers**.

Digital Accessibility Best Practices

These best practices align with both Mason’s legal responsibilities and the features that most impact users with disabilities. They also work for both web and non-web content (i.e., Word, PPT, HTML, email, etc.).

Visit the [ATI Website](#) and [Quick Guide \[PDF\]](#) for additional resources.

Architecture Standards Review Board (Procurement)

The **Architecture Standards Review Board (ASRB)** is under the *Architecture Standards Committee* and is responsible for reviewing IT solution requests prior to purchase and implementation.

The ASRB includes representatives from *Security, Enterprise Integration, Server Management, ATI (Accessibility), and Purchasing.*



Practical Strategy #4



Update your accessibility testing and remediation protocols.

Web Accessibility Monitoring, Testing, Etc.

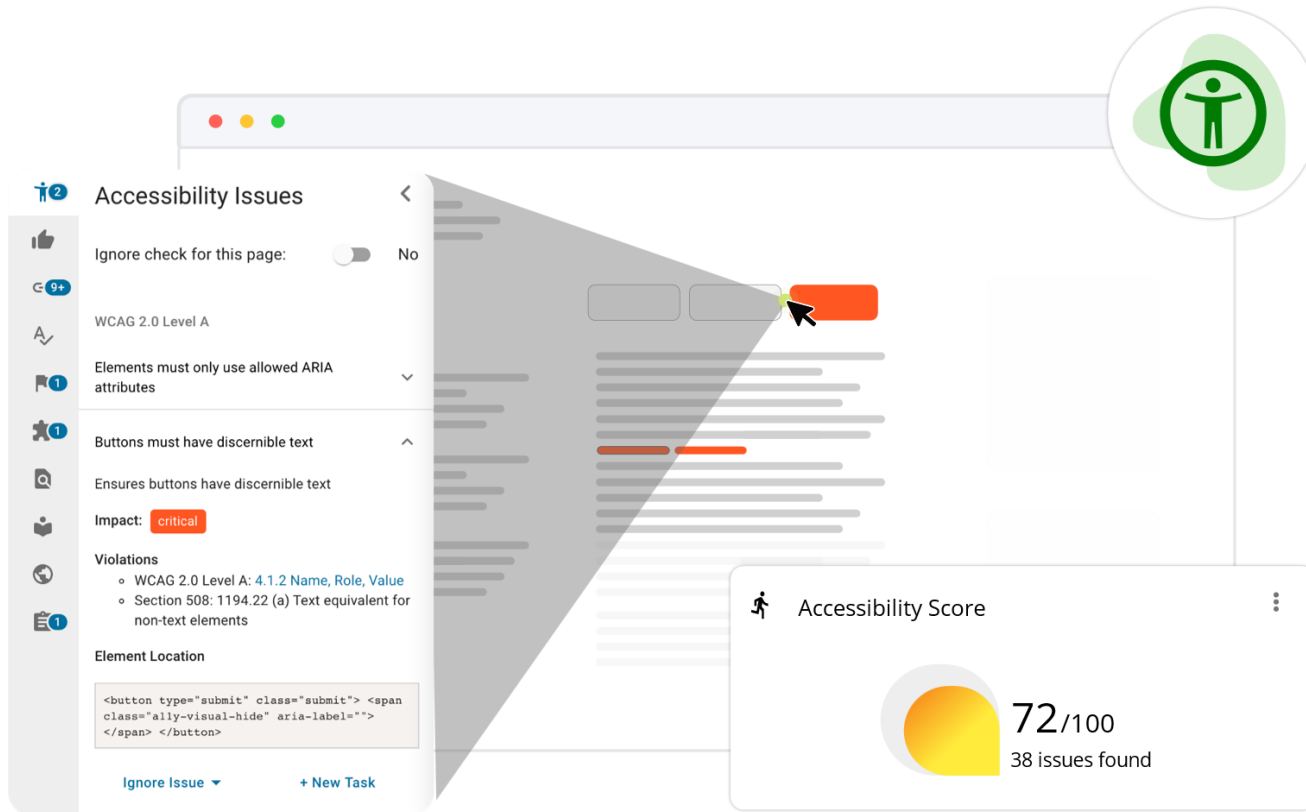


Photo taken from [Dubbot.com](https://dubbot.com)

Examples: [DubBOT](https://dubbot.com), [SiteImprove](https://www.siteimprove.com/), [PopeTech](https://www.poptech.com/)

- Assist with institutional web accessibility
- Perform following compliance checks:
 - Web Accessibility
 - Broken Links
 - Web Governance
 - Spelling & Readability
- Benefits
- Automated reviews
- Customizable
- Integrates web accessibility into university's web governance process

Web Accessibility Reviews (*by request*)

Service involves:

- Review of third-party websites or applications (e.g., Piazza, MATLAB, Pearson, etc.) for instructional faculty.
- It also involves occasional consultation and guidance to screen reader users.

Review Process:

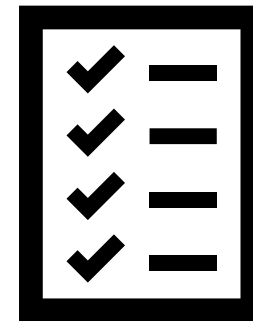
- Manual reviews using JAWS/NVDA, WAVE, ANDI, and/or CCA



Practical Strategy #5



Audit your existing content and create a corrective action plan for remediating that content.



Auditing your ICT Resources

External

- 3rd-party vendors

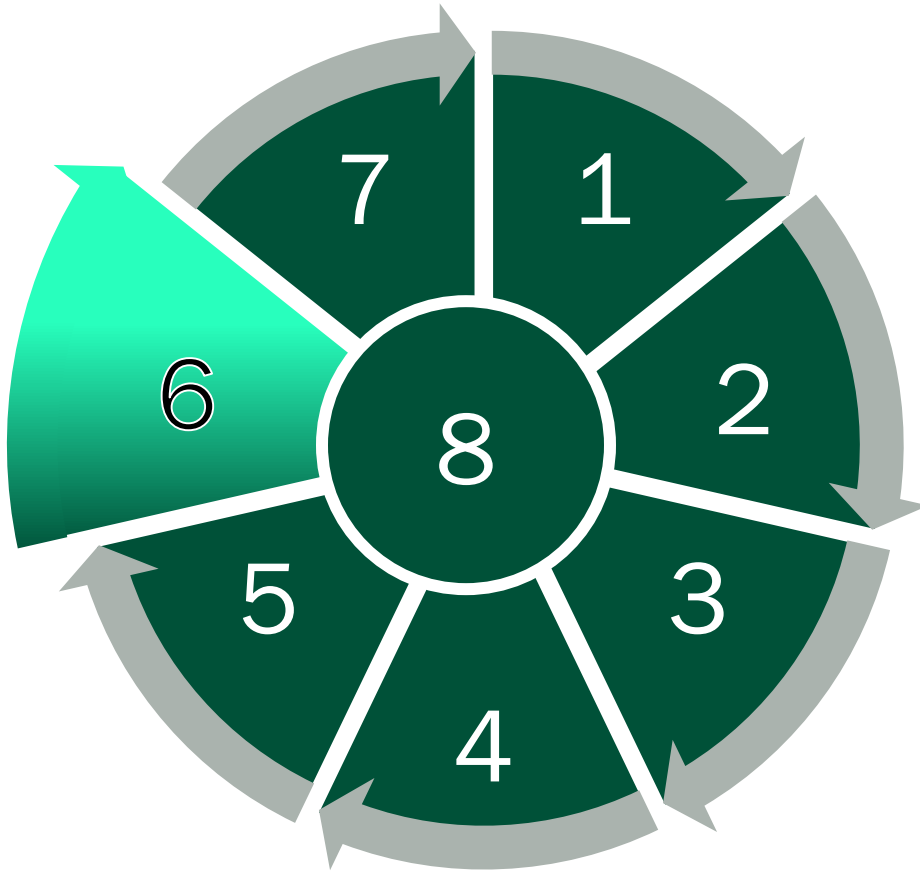
Maturity Models

- Policy Driven Adoption for Accessibility ([PDAA](#))
- [DAMM](#) (Level Access)
- [W3C](#) Maturity Model
- [Accessibility Evolution Model](#) (Microsoft)

Technology Solutions

- Web governance solutions, LMS accessibility integrations (e.g., Ally, Panorama, UDOIT), Video hosting platforms

Practical Strategy #6



Issue a public notice regarding the institution's new policies and procedures for ensuring compliance.

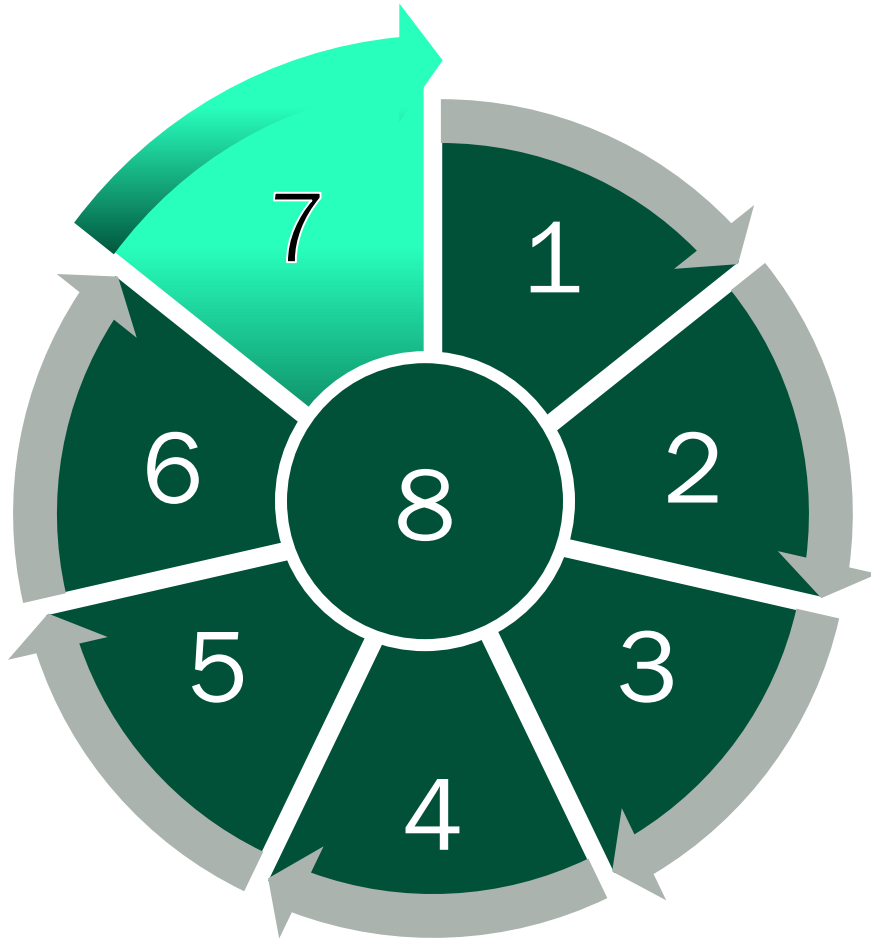


Letter from the Provost

- Mirror guidance provided in DOJ/OCR Dear Colleague Letter
- Affirmed our legal, moral, and ethical responsibilities
- Highlighted resources
- Went out to entire academic community



Practical Strategy #7



Develop grievance process for reporting barriers involving inaccessible online content.

REPORT A BARRIER

The University of Virginia is committed to equal access and the civil rights of people with disabilities. Barriers to this access may include things such as

- an inaccessible website
- an inoperative elevator,
- a blocked access ramp,
- video without captions,
- or other lack of access to an event or program.

If you have encountered a barrier to access that is **weather-related** or **involves maintenance in a University facility**, please see additional reporting information found on the [More Information For Getting Help](#) page to assure the most timely response.

For all other barriers, complete the form below. *You may submit this form anonymously. If so, you will not receive a confirmation of submission or subsequent follow-up information regarding the remediation efforts to remove the barrier.*

We will confirm receipt of your report, route the information provided to the appropriate department based on the type of barrier selected, and send remediation information to the email address you provide.

Submission of this form does not constitute a formal complaint, grievance, or request for academic or workplace accommodation. Its intent is to assist in identifying and addressing barriers to access. Thank you for helping in this endeavor.

If you are a student, faculty, or staff member at the University of Virginia, you may elect to log in using NetBadge:

NetBadge Login

Report A Barrier (UVA)

- Way to identify accessibility issues (i.e., physical, digital, attitudes/culture)
- Structure for all strategic partners to engage with and track reported issues.
- 19 participating departments/units
- [Report A Barrier Site - UVA](#)

Practical Strategy #8



Deliver training, and then annually thereafter, on website accessibility to all appropriate personnel.

Important Note: It's not *how many*, but *who*.

Provide Digital Accessibility Training

If possible, provide annual trainings for

- All teaching faculty (online, hybrid, F2F)
- Executive level
- **Targeted** (faculty teaching SWDs, departments/units)
- Content creators (web developers, web content authors, etc.)



Other strategies: Virginia Tech's [Keep C.A.L.M Initiative](#), Princeton's [IAAP Partnership](#), Mason's [TTW](#) and [DAF](#) badges

1. Attend *DAF Orientation*
2. Attend at least **2** of the 8 *Check-in Sessions*
3. Successful completion of *DAF Bb Course* (*Word, PPT, PDF*)
4. Complete *DAF Closing Survey*

Course length: 2-3 months

Incentives:

- Created a [DAF Fundamentals Badge](#)
- \$250 HR Impact Award (*funded by DEI*)

Document Accessibility Fundamentals Badge (DAF)





Trusted Tester Fundamentals (TTW)

- Completed Trusted Tester Course (*up through incremental exams*)
- *Practice and Final Exams* not required, but strongly encouraged



Course length: 4+ months

Incentives:

- Created a [TTW Fundamentals Badge](#)
- \$250 HR Impact Award (*funded by DEI*)

Photo taken from [DHS Trusted Tester](#)

GMU Approach

DCAAP



George Mason's Approach (DCAAP)



- DCAAP, or *Digital Content Accessibility Action Plan*
- **Strategic Goal:** Focus on *content creation* and *creators*
- **Timeline:**
 - *Fall 2024* – Pilot
 - *Spring thru Fall 2025* – Public Websites
 - *Fall 2025 thru Summer 2026* – Courses
- **Plan:**
 - Work with strategic partners to ensure *platform* accessibility
 - Work with ITS to streamline accessibility reviews within purchasing and procurement process
 - Leverage vendors to support remediation efforts (documents, audio/video)
 - Leverage governance solutions (e.g., DubBot) to support monitoring of accessibility efforts

Resources

*Getting Started with Digital
Accessibility*

Digital Accessibility Resources

There are a number of great resources out there, but here are a few to help you with starting on your digital accessibility journey:

- [Resources for Getting Started with Digital Accessibility](#) (W3C)
- [Technology Accessibility](#) (ed.gov)
- [OCR Video Series](#) (ADA National Network)
- [Buying Accessible Products and Services](#) (section508.gov)
- [Creating Accessible Products](#) (section508.gov)

Any Questions?

Assistive Technology Initiative
Office for Diversity, Equity, and Inclusion
George Mason University

Location: Aquia Building, Room 238
MSN: 6A11
Phone: 703-993-4329
Email: ati@gmu.edu
Web: <https://ati.gmu.edu>

