

## WEB ACCESSIBILITY POLICY

### I. Policy Section

15.0 Information Technology

### II. Policy Subsection

15.2 Web Accessibility Policy

### III. Policy Statement

Grand Rapids Community College will monitor and promote the accessibility of GRCC web content. Newly created GRCC Web Content must conform to World Wide Web Consortium (W3C), Web Accessibility Initiative (WAI), Web Content Accessibility Guidelines (WCAG) 2.0, Level AA conformance. Web content in existence prior to the passage of this policy will be evaluated for compliance with this policy and remediated going forward.

### IV. Reason for the Policy

The Americans with Disabilities Act of 1990 (ADA) and the Americans with Disabilities Act Amendment of 2009, as well as Sections 503 and 504 of the Rehabilitation Act of 1973 and Section 508 of the Rehabilitation Act Amendment of 1998 – require agencies and government-supported organizations to provide individuals with disabilities access to information that is comparable to the access and experience available to others.

### V. Entities Affected by this Policy

This policy affects all of GRCC's faculty, staff, students, board members, contractors, and guests of the college.

### VI. Who Should Read this Policy

All GRCC faculty, staff, students, board members, contractors, and guests of the college.

### VII. Related Documents

- A. GRCC's Acceptable Use Agreement
- B. Public Law 105-220, "Section 508 of the Rehabilitation Act of 1973, as amended in the Workforce Reinvestment Act of 1998"
- C. Sections 503 and 504 of the Rehabilitation Act of 1973, as amended
- D. Web Content Accessibility Guidelines – <http://www.w3.org/TR/WCAG/>
- E. Title 44, U.S.C., § 3501, "E-Government Act of 2002"

- F. Title 36, Code of Federal Regulations (CFR), Part 1194, “Electronic and Information Technology (EIT) Accessibility Standards”
- G. Title 48, CFR, 39.204, Federal Acquisition Regulations (FAR), “Acquisition of Information Technology”
- H. Federal Acquisition Regulation, Final FAR Ruling 48, CFR Parts 2, 7, 10, 11, 12 and 39 (FAC 97-27; FAR Case 1999-607)
- I. Public Law 105-220, Workforce Investment Act of 1998, Amendment to Section 508 of the Rehabilitation Act (29 USC 794d)
- J. GRCC-specific policies and directives that relate to accessibility, equal opportunity, and reasonable accommodations

VIII. Contacts

Policy Owner: Chief Information Officer  
Communications Director  
Director of Equal Opportunity Compliance

IX. Definitions

- A. Accessibility Advocate: GRCC employees (faculty and staff) who have been specially trained to assist other employees in resolving accessibility concerns, to include creating accessible documents, trouble-shooting web accessibility issues, and implementing remediation plans, as referred to in this policy.
- B. Compliance: Adherence by Web Editors to the best practices and standards set forth in this policy when creating, organizing and posting GRCC content to the web.
- C. Department Owner: GRCC department supervisors or directors are responsible for collaborating with the Communications and IT Departments to maintain accessible GRCC web content.
- D. Web Content: Information provided on any GRCC-owned websites, as part of any Learning Management System (LMS), through links to external sites which are posted on other Web Content, and any other content posted on an online GRCC-owned source.
- E. Web Editor: GRCC faculty and staff who are assigned by their department heads or supervisors to maintain accessible GRCC web content for departments or organizations. In addition, any GRCC faculty and staff who create and maintain online course and organization content are responsible for maintaining accessibility in the content they create, maintain, and link to externally.

F. Web Monitor: GRCC's Chief Information Officer will designate a Web Monitor to monitor and ensure that all Web Content is compliant with this policy. The Web Monitor will also report as needed on aggregate information, trends in inaccessible content, and training needs. The Web Monitor will work with the Communications Department, as well as Department Owners and Web Editors to address and enforce web accessibility policy compliance

## X. Procedures

### A. Monitoring

1. The Web Monitor will monitor GRCC's Web Content weekly to evaluate compliance according to ADA and the W3C, WAI, WCAG web accessibility standards. All Web Content will be checked by an electronic auditing software, which will also check for broken links to external sites. External sites will not be monitored, but all those who develop and edit content (to include the Communications Department, Department Owners and Web Editors) should evaluate external sites for accessibility before linking to those sites.
2. The Web Monitor will maintain documentation and reports that outline how GRCC's Web Content is being monitored and how concerns are/have been remediated.
3. The Web Monitor will consult with the Communications Department quarterly to review compliance, outline concerns, and develop/update a remediation action plan(s). The Web Monitor and Communications Department will report this information upon request to the Director of EO Compliance. The Communications Department is ultimately responsible for the maintenance of accessible GRCC content on the web.
4. Complaints related to web accessibility may be directed to the Communications Department as well as the Director of EO Compliance.

### B. Training and Accountability

- a. The IT Department will coordinate and conduct Department Owner and Web Editor training – including new user and refresher courses – in collaboration with the Communications Department on a regular basis. Training sessions will engage, when appropriate, the Center for Teaching Excellence (CTE) or Human Resources Staff Development, with consultation provided by the Director of EO Compliance where necessary. Training will focus on the web accessibility policy and its features, common areas of concern, and tips and tools for creating and posting

accessible GRCC web content. Ongoing training opportunities will be available through Staff Development, CTE, Department of Learning and Instructional Design (DLIT), and Accessibility Advocates for Department Owners and Web Editors who would like additional training.

- b. Web Editors who are assigned by their departments to create or modify web content are required to participate in one refresher course annually to maintain a working knowledge of the best practices and standards set forth in this policy when creating, organizing and posting GRCC content to the web. Failure to participate in ongoing training may result in suspension of Web Editors' access rights until training is completed. Department Owners will be notified of these training opportunities, and may attend as well.
- c. Accessibility Advocates will be trained in specific areas; i.e. faculty Accessibility Advocates will be trained in Blackboard and on course-specific concerns to aid other faculty members. Accessibility Advocates will also be trained to conduct broader training sessions on general accessibility concerns.

### C. Remediation

- a. If an accessibility concern is raised (through auditing software, a complaint, or otherwise) regarding any Web Content, the Web Monitor will reach out to the Department Owner or Web Editor to notify them of the finding and to create a remediation plan to correct the concern. The remediation action plan will be created by the Web Monitor in consultation with the Department Owner or Web Editor with input provided by the Communications Department and/or Director of EO Compliance, where needed.
- b. The Web Monitor, in collaboration with the Communications Department, will implement remediation action plans, create and enforce timelines, and monitor progress. While individual timelines may vary depending on the intricacy of the concern and time involved, Department Owners and Web Editors will ultimately be responsible for compliance with remediation action plans in a timely manner as assigned by the Web Monitor and/or the Communications Department.
- c. The Department Owner or Web Editor will be directed to the Web Monitor and Communications Department for assistance in implementing the remediation action plan. Resources will also be available through IT, CTE, DLIT, or Accessibility Advocates in their area, who can provide specific assistance as needed.

- d. Any complaints about failure to comply with the remediation action plan will be reviewed and investigated, where appropriate, by the Director of EO Compliance, in collaboration with Department Owners and their respective supervisors.
- e. If Department Owners or Web Editors refuse to comply with remediation action plans, the Web Monitor and/or Communications Department, in consultation with the Director of EO Compliance and/or the appropriate supervisor, may remove GRCC content from the web. If this action is taken, information will be published in the appropriate location on available GRCC assistive services, such as email, fax or phone options until the remediation action plan can be completed.
- f. If it is not possible to remediate GRCC Web Content in a timely manner, the Department Owners and Web Editors are responsible for providing alternative access to the information. In these cases, the Web Monitor and Communications Department should be consulted to verify that remediation is not possible or feasible. The Director of EO Compliance may be consulted as needed to ensure that appropriate alternative access is provided.

XI. Forms

*None listed*

XII. Effective Date

February 12, 2013  
Revised July, 2017

XIII. Policy History

This policy was created in 2013 to address accessibility for persons with disabilities.

This policy was modified in 2017 to clarify the roles and responsibilities of the Web Monitor, Communications Department, Compliance Officer, Department Owners and Web Editors for compliance, as well as clarify ongoing training opportunities.

XIV. Next Review/Revision Date

August, 2018