

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 promote and monitor the accessibility of its web-based information, which includes third-party sites that GRCC contracts with or links to. All of GRCC's web content should conform to W3C WAI's Web Content Accessibility Guidelines 2.0, Level AA conformance.

IV. Reason for the Policy

The Americans with Disabilities Act (ADA) and the 1998 amendment to the Rehabilitation Act of 1973 (Section 508) requires 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.

VII. Related Documents

1. GRCC's Acceptable Use Agreement (should be modified to include this policy)
2. Public Law 105-220, "Section 508 of the Rehabilitation Act of 1973, as amended in the Workforce Reinvestment Act of 1998"
3. Section 503 of the Rehabilitation Act of 1973, as amended
4. Web Content Accessibility Guidelines – <http://www.w3.org/TR/WCAG/>
5. Title 44, U.S.C., § 3501, "E-Government Act of 2002"
6. Title 36, Code of Federal Regulations (CFR), Part 1194, "Electronic and Information Technology (EIT) Accessibility Standards"
7. Title 48, CFR, 39.204, Federal Acquisition Regulations (FAR), "Acquisition of Information Technology"

8. Federal Acquisition Regulation, Final FAR Ruling 48, CFR Parts 2, 7, 10, 11, 12 and 39 (FAC 97-27; FAR Case 1999-607)
9. Public Law 105-220, Workforce Investment Act of 1998, Amendment to Section 508 of the Rehabilitation Act (29 USC 794d)
10. GRCC-specific policies and directives that relate to accessibility, equal opportunity, and reasonable accommodations

VIII. Contacts

Policy Owner: Chief Information Officer
General Counsel
ADA Compliance Officer

IX. Definitions

1. Compliance: adherence to the web accessibility standards and practices detailed in the Web Content Accessibility Guidelines 2.0 WCAG Priority 2, AA web accessibility standards.
2. Remediation: the process that is undertaken to retrofit, redesign, or remove the content from the website that is found out of compliance.
3. Content owner:
 - a. Any individual capable of accessing and posting content on any of GRCC's online content.
 - b. Any third party responsible for posting content on behalf of GRCC.
 - c. A web-based service contracted by GRCC that serves a GRCC business and the GRCC employees responsible for administering those sites.

X. Procedures

1. Responsibility
 - a. ADA Compliance Officer or designee (hereinafter "Compliance Officer") shall be responsible for ensuring that information and services offered via GRCC's websites are compliant.
2. Proactive Monitoring
 - a. The Compliance Officer will monitor the websites and services in order to evaluate compliance with accessibility standards and practices according to the Americans Disability Act of 1990 and the Americans Disability Act Amendment Act of 2009, Section 503 of the Rehabilitation Act of 1973,

Section 508 of the Rehabilitation Act 1998 and the W3C/WAI/WCAG AA web accessibility standards.

- b. Monitoring tools may be run at any interval but no less than each quarter. The Compliance Officer will then send a web-based information check sheet stating the degree of compliance to the CIO. If non-compliant, remediation will apply.
- c. Anyone posting content must review content to ensure it meets the accessibility standards prior to publication or notification of any substantial change in accessibility standards.

3. Accountability

- a. The Compliance Officer will regularly report, track, and evaluate the status of the websites and contracted web services to ensure compliance with Priority 2, AA accessibility standards. Web pages that are reported as non-compliant will be reviewed by the ADA Compliance Officer.
- b. Where possible, the websites will have a link to report accessibility problems to the ADA Compliance Officer.
- c. The Compliance Officer will notify the content owners of any instance of non-compliance. The content owner shall be responsible for remediation according to the guidelines and time lines established by the agreement with the ADA Compliance Officer. The Compliance Officer shall ensure that the remediation steps are taken in a timely manner or the Compliance Officer will remediate the issue directly. Lack of remediation on the part of contracted services could lead to termination of contract services and/or a hold on payment.
- d. The Compliance Officer will be responsible for maintaining a record of reported instances of non-compliance and their ultimate resolution.
- e. The IT Department may initially provide assistance to departments without web content developers. The Center for Teaching Excellence Department will coordinate faculty training for those departments regarding the development and publication of accessible content. The Staff Development Department will train staff (non-faculty) content developers.

4. Remediation

- a. The Compliance Officer shall ensure that the website and contracted web services that fail to comply with accessibility will receive remediation in a timely manner.

- b. When web pages cannot be made accessible in a timely manner, the content owner will be responsible for providing alternative access to the information.
- c. If not remediated in a timely manner, the IT Department will bring the content into compliance and inform the Compliance Officer of the changes made. The Compliance Officer will follow up with the content owner(s) of these pages to ensure proper training is administered, so future issues of this nature do not occur.
- d. If remediation is not possible, and alternative access is not an option, content will be published with information on available assistive services (Phone number, fax, email options).

5. Retrofit Accessibility

- a. Content owners shall provide alternative ways for persons with disabilities to obtain services and information during any period of time where a website or contract web service is undergoing retrofit in order to comply with accessibility standards.

6. Training

- a. Content owners are required to maintain a working knowledge of accessibility standards. Grand Rapids Community College will provide mandated and on-going training for content owners who develop and maintain GRCC's websites in order to ensure that those who post content understand accessibility standards.

XI. Forms

Please include copies of forms required by this policy.

XII. Effective Date

February 12, 2013

XIII. Policy History

This is a new policy created to address accessibility for persons with disabilities.

XIV. Next Review/Revision Date

February 1, 2015