

WEB ACCESSIBILITY

I. Policy Section

15.0 Information Technology

II. Policy Subsection

15.2 Web Accessibility Policy

III. Policy Statement

Grand Rapids Community College is actively committed to providing equal opportunity to persons with disabilities, including equal access to all GRCC Web Content. GRCC 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 standards.

IV. Reason for the Policy

Accessible Web Content enhances the usability for all web users and ensures that as broad a population as possible is able to access and benefit from GRCC's services. Implementing the requirements outlined in this policy also ensures grcc.edu is in line with best practices for user experience, which promotes student recruitment, retention, and success.

In addition to our aims and values, 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

GRCC employees, students, board members, contractors, and guests of the college.

VI. Who Should Read this Policy

GRCC employees, students, board members, contractors, and guests of the college.

VII. Related Documents

- A. GRCC's Acceptable Use Agreement
- B. Americans with Disabilities Act of 1990, including 2008 Amendments
- C. The Rehabilitation Act of 1973, notably Section 503, Section 504, and Section 508
- D. Web Content Accessibility Guidelines - <http://www.w3.org/TR/WCAG/>
- E. Title 36, Code of Federal Regulations (CFR), Part 1194, "Information and Communication Technology Standards and Guidelines"
- F. Title 48, CFR, Part 309, "Acquisition of Information Technology"
- G. GRCC Policy 3.2: Non-Discrimination on Basis of Disability
- H. GRCC Policy 6.2: Equal Opportunity and Non-Discrimination
- I. Other GRCC policies and directives that relate to accessibility, equal opportunity, and reasonable accommodations

VIII. Contacts

Policy Owner: Chief Information Officer
Web Team
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, troubleshooting 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. Electronic Document: Any file attachment including but not limited to Portable Digital Files (PDFs); Word documents, PowerPoint presentations or spreadsheets; and Google Docs, Sheets, or Slides.
- E. Remediation: The process of correcting non-compliant information. This includes making inaccessible documents or Web Content compliant by World Wide Web Consortium (W3C), Web Accessibility Initiative (WAI), Web Content Accessibility Guidelines (WCAG) 2.0, and Level AA standards.
- F. 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.
- G. 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.
- H. Web Team: Web Content Manager, Web Systems Architect, Director of Academic Applications

X. Procedures

A. Monitoring

1. The Web Team 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, IT Department, Department

Owners and Web Editors) should evaluate external sites for accessibility before linking to those sites.

2. The Web Team 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 Team will report this information upon request to the Director of EO Compliance. The Communications Department is ultimately responsible for the maintenance of accessible GRCC Web Content as defined in this policy.
4. Complaints related to web accessibility may be directed to any member of the Web Team as well as the Director of EO Compliance.

B. Training and Accountability

1. The Web Team will coordinate and publish training material on the college website. The creation and dissemination of this material will engage, when appropriate, Accessibility Advocates, the Center for Teaching Excellence (CTE) or Human Resources Staff Development, with consultation provided by the Director of EO Compliance where necessary. Training material will focus on web accessibility, user experience best practices, common areas of concern, and tips and tools for creating accessible content. Online training material will be made available to all Department Owners and Web Editors.

2. Web Editors who are assigned by their departments to create or modify Web Content are required to participate in one Drupal Web Editor training 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.

3. Accessibility Advocates will be trained on course- and faculty-specific concerns, including document accessibility. Accessibility Advocates will also be trained to assist individuals and conduct broader training sessions on general accessibility concerns.

C. Remediation Processes

1. Department Owners and Web Editors are encouraged to publish content found in Electronic Documents as web copy within webpages in an effort to promote accessibility, the search engine optimization of Web Content, and web user experience.

2. New documents will be uploaded to the website if:

- The Electronic Document is required to remain online by any accreditation organization, or local, state or federal laws or regulations.
- It is essential to department or college processes that the Electronic Document is made available for print from gcc.edu

If a newly created Electronic Document does not meet the outlined criteria, a Web Team member will work with the Department Owner or Web Editor to publish the content in an already existing or new webpage, webform or other online format.

3. Newly created Electronic Documents that meet the outlined criteria must submit a ticket to the IT Help Desk at least two weeks in advance of the requested online publication date for the material to be made accessible.

4. If an accessibility concern is raised (through auditing software, a complaint, or otherwise) regarding any Web Content, a Web Team member will reach out to the Department Owner or Web Editor to notify them of the finding and to create a plan to correct the concern. A remediation action plan will be created by a member of the Web Team in consultation with the Department Owner or Web Editor with input provided by the Director of EO Compliance where needed.

5. 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.

6. If Department Owners or Web Editors refuse to comply with the policy guidelines or remediation action plans, the Web Team, in consultation with the Director of EO Compliance, may implement a remediation action plan or remove the inaccessible content from the web.

XI. Forms

N/A

XII. Effective Date

February, 2013

July, 2016 (revisions)

December, 2016 (revisions)

July, 2017

November, 2018

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.

This policy was modified in 2018 to clarify the roles and responsibilities of the Web Team, promote best practices in web accessibility, and clarify training resources.

XIV. Next Review/Revision Date

August, 2020