

HSU Web Accessibility Implementation Plan

June 15, 2007

1. A process for establishing accountability and documentation procedures.

The ATI project offers HSU a convenient timeline for accomplishing several things that have been under consideration anyway. HSU has a widely distributed web development environment, and we have been interested in (a) keeping better track of who our web developers are and where they store their content, (b) building a community among our web developers for their mutual support and skill development, and (c) finding an effective way to communicate with web developers about policies, projects, resources, style guidelines, etc.

We are therefore proposing to build and implement the following processes:

- a) **Registering a web server** – to deliver content with an Humboldt.edu URL, a server will need to be registered; an ‘owner,’ responsible systems administrator, operating system and web server software, physical location and ip address will need to be identified
- b) **Registering a web site** – (assume a ‘site’ means a collection of individual web pages containing fairly homogeneous information) for any unit or individual wishing to publish a web site that conducts University-related business and wishes to be linked to the Humboldt.edu web presence, site registration will be required; an ‘owner,’ the developers designing and maintaining the site, and any applications the site will run will need to be identified; owners will need to indicate if they need a share on our central web server (a ‘univ account’); owners will need to indicate with which of the five University divisions (Academic Affairs, Administrative Affairs, Student Affairs, Advancement, or the President’s Office) the site is associated. If the site does not need a univ account, they will need to register their requested domain name space with, and/or request their desired redirects or links from, the University Web Manager. Each owner will also register the top-level URL for the site.
- c) **Registering users** – it is possible to request an individual user account, separate and distinct from a univ account; an individual account, on request, can be provisioned with a folder having appropriate rights to allow a user to publish content to the web. Users requesting such a folder will need to indicate if they plan to publish web material that is covered by the University Web Accessibility Policy, and with which of the five divisions their material is associated.
- d) **Required training** – registered server owners, server system administrators, site owners, site developers and individual web site owners will all be directed to training in Moodle that is appropriate to their particular role.
- e) **A web developers’ community** - at the completion of training, owners, developers and individual web site owners will be added to a Moodle community designed for those engaged in web development for the purposes of conducting HSU related business.

- f) **Required documentation** – site owners will be ultimately accountable for the web site and responsible for making sure that developers verify the accessibility of every web page before it is posted, and retain/post the HiSoft and manual checklist reports to document accessibility for each page.
- g) **Control Points**
 - a) Univ accounts will not be activated until registered site owners complete their required training
 - b) User accounts will not be activated until users complete their required training
 - c) Participation in the web developers community will not be activated until registered developers complete their required training
 - d) domain names, redirects and external links will not be activated until those site owners complete their required training
 - e) Server owners, site owners, and users will be required to verify and/or update their registration information once per year; updates to registration information can be voluntarily submitted at any time
 - f) Divisional web representatives will be notified of each site and user declaring an association with that division

To implement these new processes, we will engage in the following tasks:

- a) Set up the new environment for univ accounts on our new web server and user accounts within our central file shares
- b) Create the scripts and interfaces that will underlie each registration process
- c) Create the various training modules needed, and set up a Moodle site for delivering and documenting the training;
- d) Set up a web developers community on Moodle
- e) Communicate with campus that all new web servers, web sites (univ accounts, domain name spaces, redirects, and external links) and users (user accounts) will be registered through the above processes and located on the new web server or in the new user account environment
- f) Invite existing web servers, web sites and users to migrate into the new environment (improved hardware and service), carefully updating their published material to meet all Section 508 standards as they migrate.
- g) Set up AccMonitor to monitor all sites and pages migrated onto the new environment, or registered to additional servers
- h) Monitor progress in migrating all servers, sites and users into the new environment, with spirited encouragement where needed

Responsibility:

- for system and procedure development, Information Technology Services, specifically Central IT Systems and Services,
- for helping campus understand how to use the new environment, the ATI communications team and the ATI training team

Timeline:

- The new account structures and registration processes will be in place by Fall Term 2007.
- Campus awareness about the new environment, training on its use, and training on designing for accessibility will start in Fall, and be ongoing

2. A process for auditing, monitoring and remediation of websites.

Comprehensive auditing and monitoring requires **three complementary processes**:

One:

As sites are migrated to the new web server, they will need to meet all the accessibility requirements. Their registration process will provide:

- a) an association with one of the University's five divisions, and thus the site will be made known to the divisional web representative
- b) an email address for the owner
- c) the URL for the top level of the site
- d) Training for web site owners will include their responsibility to provide the AccMonitor Administrator with the names of urls and files that should be crawled by AccMonitor, and for collecting and archiving AccVerify and manual assessment reports for each page on their site.
- e) Each site will be audited by AccMonitor every 3 months
- f) Emails for any error reports will go to the divisional representative, the web site owner, the University Web Manager, and the AccMonitor Administrator. As specified in the HSU Web Accessibility Policy, error reports trigger a set of steps that can result in having the web site removed from service if appropriate repairs aren't made on a timely basis.

Two:

All Domains with web servers registered as conducting HSU business will be crawled from the top level for ten levels once every 6 months. Error reports will be sent to the Acc Monitor Administrator.

The error reports will be correlated to the error reports generated by Process One, as described above. If any error reports are different than the Process One generated error reports, the

AccMonitor Administrator will contact the appropriate divisional web representative, site owner, and University Web Manager.

Three:

A random sample of registered sites will be selected for audit once each year, in advance of the annual report to the Chancellor's Office. AccMonitor will be run for each of the sites with the full reports being stored on the server in a shared folder.

Registered owners of randomly selected sites will be requested to submit their AccVerify and manual check documentation for their site to the group responsible for creating the annual report.

Responsibility:

- for helping campus understand how to use the new environment, the ATI communications team and the ATI training team
- for setting up AccMonitor, running AccMonitor, and reporting the results of AccMonitor, the ATI Technical Resource.

Timeline:

- Campus awareness about the new environment, training on its use, and training about web site owner responsibilities will start in Fall, and be ongoing
- Monitoring and auditing processes using AccMonitor will be run against sites that have been moved into the new account environment, and according to the timelines stated above, beginning in February 2008. Process One will be run in February, May, August, and November of each year; Process Two will run in November of each year; Process Three will run in May of each year.

3. A strategy to ensure that new websites and web content incorporate accessibility in the design and authoring process.

As outlined in item #1 of this report, HSU will implement a process ensuring that each web site will have a registered owner who is ultimately responsible for the accessibility (as well as other compliance issues) of the web site. The registration process (and associated accountability) will cover all official HSU web sites regardless of the domain name or server on which they are hosted.

The registration process will also require that any web developers working on the site be identified. These web developers will be enrolled in a Moodle course that describes accessibility requirements, accessibility checking/monitoring procedures, and supported development software. Web developers must acknowledge that they have read and understand the material in the course before working on official HSU web sites.

Web Site owners should not use unregistered, untrained web developers to develop official HSU web sites. An Executive Memorandum or other communication from the President will explain this requirement to the campus.

Responsibility:

- for system and procedure development, Information Technology Services, specifically Central IT Systems and Services,
- for helping campus understand how to use the new environment, the ATI communications team and the ATI training team
- for designing and publishing new websites and web content that incorporate accessibility, site owners

Timeline:

- The new account structures and registration processes will be in place by Fall Term 2007.
- Campus awareness and training will start in Fall, and be ongoing
- Timelines for accessibility of new sites are specified in the Chancellor's coded memo

4. A process for determining exceptions and for developing, documenting and communicating the equally effective alternate form of access that will be provided.

Determining Exceptions:

Generally speaking, websites that are developed by HSU web developers will be relatively easy to make fully accessible. By using best practices and good website design principles, HSU web developers should be able to design accessible and attractive websites and will not have to seek exceptions to the Humboldt State University Policy on Web Accessibility requirements.

From the Humboldt State University Policy on Web Accessibility:

Requests for Exceptions. All requests for exceptions to this policy must be made to a divisional representative, who will grant or deny the exception based on the criteria listed below. All requests for exceptions must identify an equally effective alternative form of access, as defined in Coded Memo AA-2007-04. If the divisional representative endorses the request, the exception request must be submitted to the web manager who will give the final authorization. Quarterly reports of exceptions granted shall be submitted by the web manager to both the University Executive Committee and to the Advisory Committee on Students with Disabilities. Appeals to the web manager's decision shall be made to the University Executive Committee.

Exceptions

1. Web sites and pages that are no longer actively linked to the campus web site but are subject to records retention plans are considered to be in archive status and do not have to be converted to Guidelines for a Reasonably Accessible Web Site unless specifically requested by the University Executive Committee.
2. Where compliance is not technically possible or may require extraordinary measures due to the nature of the information and the intent of the web page, exceptions to Guidelines for a Reasonably Accessible Web Site may be granted. Request for such exceptions must be based on issues other than cost or time alone, and must provide an equally effective alternate form of access.

Enforcement

Procedures for enforcement are as follows:

- **Implementation and Enforcement.** The University Executive Committee shall identify individuals responsible for implementation and enforcement of this policy in each of the five divisions – Academic Affairs, Administrative Affairs, Student Affairs, University Advancement and Office of the President. The University Executive Committee will provide a list of these divisional representatives to the web manager. In cases of divisional overlap with regard to accountability for a specific web page, questions about which division is responsible should be referred to the University Executive Committee.

5. Developing, Documenting, and Communicating Equally Effective Alternate Form of Access:

Equally effective communication has three components: (1) Timeliness of delivery, (2) accuracy of the translation, and (3) provision in a manner and medium appropriate to the significance of the message and the abilities of the individual with the disability.

Because creating accessible websites is relatively easy, we feel that the occasion of needing an equally effective alternate form of access will be infrequent. However, in the event that a website is not accessible and an alternate form of access is necessary, the following process will be used to ensure equally effective communication:

One:

Each web site, on the top page of that site, should clearly identify how to obtain information and services and include complete contact information for those responsible for fulfilling information requests. Ideally, the department will be able to meet the individual's need. However, as noted above, equally effective communication has three components. One of the components is the provision in a manner and medium appropriate to the significance of the message and the abilities of the individual with the disability. Therefore, what is effective communication for one individual may not be effective communication for another individual.

Two:

Training will occur across campus to teach site owners how to develop alternate formats of accessible materials (e.g., brochures, documents, common file formats that may satisfy some requests for alternate formats). General trainings and FAQ's can include information that will assist individuals and departments in providing accessible alternate formats in the majority of circumstances, but there will always be exceptions and difficult cases where extra-ordinary alternate formats will need to be provided. Training will be the responsibility of the Assistive Technology Specialist because of the expertise required.

Three:

Generally speaking, the individual with a disability who requests information will be the best person to specify what type of alternate format would work best for them. However, if the individual is not available for input, then the Assistive Technology Specialist with the Student Disability Resource Center is the person with the expertise to determine what an "equally effective alternate form of access" is given a general knowledge of an individual's abilities and the content to be disseminated.

Challenge/Issue:

Given the current staffing of the Student Disability Resource Center, and the responsibilities of the AT Specialist, the AT Specialist may not be able to handle campus requests in a timely manner because of priorities to meet students' access needs. The AT Specialist's primary focus must be on meeting student's immediate access needs; thus, training will take a secondary priority and may not be immediately available.

6. A process for identifying critical administrative websites that require remediation.

For the last several years, HSU has intentionally and carefully improved HSU's primary web presence. The navigation pathways now available directly from www.humboldt.edu have already been winnowed through a shared and considered decision making process, and serve as a de facto definition of what is 'critical' for our potential recruits, our public, and our students, faculty and staff to find easily. Those sites (not pages – but sites) which can be directly navigated to from our home page have been compiled as our 'critical administrative websites' list; the list is not substantially different from the "sample" set of web pages we reviewed for our first year web report.

Responsibility:

- Identifying those administrative web sites which are deemed to be 'critical' has already been completed; the list is available as an appendix to this report.
- The ATI Steering Committee will identify a resource for assessing the accessibility of any 'critical' sites not already reviewed the "sample" first year web project

Timeline:

- The new account structures and registration processes will be in place by Fall Term 2007.

- Campus awareness about the new environment, training on its use, and training on designing for accessibility will start in Fall, and be ongoing
- For any sites not already assessed through the “sample” first year web project, assessments will be completed by December of 2007, and site owners notified.

7. A process for providing alternative ways of delivering information during any period in which websites are undergoing retrofit.

When websites are undergoing retrofit, information may be delivered in any of the following ways: via a “placeholder” page, phone, email, postal mail, and in-person. Recognizing that these methods do not provide the 24/7 access that the Internet provides to information, requests for information must be handled in a timely manner to facilitate effective communication.

Responsibility:

- Web site owners

Timeline:

- Alternative ways of delivering information should be prepared before any website is ‘taken down’ for retrofit

8. A training plan for those who develop and maintain websites and who author web content.

Appropriate HSU technology staff will create accessible website development courses appropriate to multiple audiences: web server owners, web site owners, web site developers and users who intend to post web content that is covered by the University Web Accessibility Policy.

Courses will be offered as a series of individual units. Every version of the training will address the HSU Web Accessibility Policy, background information on ADA and Section 508 legislations, the Accessible Technology Initiative, the EnACT grant program, testing for accessibility, ongoing monitoring, repair, documentation, and copyright and intellectual property policies.

Additional course units will include:

- general website design
- appropriate website authoring using common development tools like Dreamweaver
- how to add alternate text descriptive tags to images on websites, in PowerPoint and embedded within PDFs
- converting non-accessible PDFs to accessible PDFs for each of the major originating applications (i.e. Word, PowerPoint, Excel, etc.)

- useful resources, such as various validator reports and their interpretations, FAQs, student/instructor discussion boards, links to 508 standards, campus policies, checklists, guidelines, validators, vendors, professional organizations, regional conference and workshop schedules, etc..

After the appropriate training and quiz-based assessments have been completed, web server owners, web site owners, web developers and users will be required to acknowledge that they have read and understand the material. See item number **1.g. Control Points** above for the subsequent processes, resources and services that become available after training is completed.

The courses will be developed as online modules, but parallel face-to-face components will be made available for those who prefer learning in that manner. A number of instructors will need to be identified, as well as an appropriate meeting place such as the Faculty Technology Solutions Center, and the LMS course materials will need to be developed.

Appropriate outreach components of this training plan would be (a) to make it possible for students to enroll in the courses for credit and generate FTES, (b) to encourage faculty who teach web development courses to incorporate web accessibility procedures and tools into their curriculum, and (c) to establish either fee waivers or professional development credit for staff taking the courses for credit.

Representatives of the ATI committee and ATI Instructors will be encouraged to visit all appropriate department meetings on campus and give a ten minute ATI presentation to instructors. At this time they could offer hardcopy handouts, and demonstrate a web page that instructors can link to from their website or LMS based course.

Responsibility:

- Information Technology Services, specifically Instructional IT Systems and Services, will have primary responsibility for developing an ATI training plan, in collaboration with: the campus Web Manager, the HSU EnAct project, the Central IT Systems and Services team designing our new web account environment, and the ATI Steering Committee

Timeline:

- ATI training will begin Fall 2007 and be ongoing

9. A communication plan to educate the campus about web accessibility requirements.

Communication style is to be upbeat and encouraging to relieve anxiety and instill a sense of enthusiasm for, and leadership in, Universal Access.

a) Presidential Communication

- An initial letter of commitment was sent out by the President on March 27, 2007

- Accessibility and universal design will be incorporated into the President's Fall 2007 Convocation presentation
- b) An ATI web page has been established as a repository for documents and information, training opportunities, FAQs, timelines and progress of the ATI team (still under development; see www.humboldt.edu/~ati).
 - c) The Executive co-Sponsors (Kevin O'Brien and Anna Kircher) will provide bi-annual Progress Reports from ATI Steering Committee to the President's Executive Council; the first was presented on May 17, 2007.
 - d) Beginning Summer 2007, introduce the Web Council to the ATI project, principles, activities, and resources.
 - e) Beginning in Fall Term 2007, ATI Steering Committee and sub-committee members will schedule and provide:
 - Power Point presentation to the Academic Senate
 - Presentation & Q&A session for Department Chairs
 - Presentation & Q&A session for the "Information Exchange" (scheduled just before the start of each term for all academic support coordinators)
 - Presentation and Q&A at regular business meetings across the other divisions of the University
 - f) As noted in Item #7 Training:

"Representatives of the ATI committee and ATI Instructors will be encouraged to visit all appropriate department meetings on campus and give a ten minute ATI presentation to instructors. At this time they could offer hardcopy handouts, and demonstrate a web page that instructors can link to from their website or LMS based course."
 - g) Communicate ATI's goals and progress to our "on-campus" and "off-campus" communities via the following vehicles:
 - Web page
 - KHSU-homepage- interview
 - Lumberjack- interview
 - Humboldt State News on Line

Responsibility:

- A sub-group of the ATI Steering Committee, the Communications Group, is responsible for designing and facilitating the communications plan. The sub-group may call upon other Steering Committee members, EnAct Project participants, training team participants, and other staff resources across the University to carry out the plan.

Timeline:

- The Communication plan has already been initiated, and will be ongoing.

10. An evaluation process to measure the effectiveness of the plan.

Evaluation of the effectiveness of this plan will be the responsibility of the ATI Steering Committee. The committee will review the plan and timelines quarterly in order to become aware of risks and challenges in a timely manner.

Assessment for the 07-08 year, to be included in next year's report to the Chancellor's Office, will include measures such as the degree of completion of specific tasks identified in this plan; the number of web site owners, web site developers, and individual web page owners completing ATI training; the number of 'critical' sites generating error reports by AccMonitor; feedback from divisional web representatives; and feedback from web site owners and developers.

11. Necessary resources that have yet to be located

In April of 2007, the ATI Steering Committee submitted a budget proposal to the President and Provost requesting resources for accomplishing the work in this plan, along with the plans for the Instructional Materials and Procurement priorities of the ATI project. The budget includes a project manager, technical staff to manage the AccMonitor and AccVerify products, a training coordinator, an instructional materials coordinator, a procurement specialist, and students to assist with the work of bringing legacy web sites and instructional materials into compliance. (All the proposed personnel are part-time, with the exception of the trainer.) The budget also includes minimal funds for supplies and travel to ATI training opportunities hosted by the CSU system. The budget totals approximately \$250,000 per year, and was deemed by the ATI Steering Committee as the minimal resource necessary for accomplishing the goals of the ATI project.

To date, no budget has been allocated.