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# Web Accessibility Implementation Plan 2019-2023

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## Overview

This plan outlines how the California State University (CSU) Accessible Technology Initiative (ATI) shall be implemented at California State University Channel Islands (CSUCI) with respect to accessibility of web sites and web content, in alignment with [California State University Executive Order 1111](http://www.calstate.edu/eo/eo-1111.html). CSUCI has implemented tools and processes since 2005 (prior to ATI) which demonstrate the University’s commitment to accessibility of web content. A plan for campus implementation of ATI was first published in 2014 on the campus web site. The first plan spanned the period of 2014-2018.

This plan shall be reviewed and updated annually by the department of Information Technology Services (ITS).

## Definitions

*Web site or web content*: Any single piece or collection of data, documents or information in any format, published on an intranet or the World Wide Web.

*Acceptably accessible:* A web site or web application is considered “acceptably accessible” when all of its content meets CSU ATI guidelines.

*Assistive Technology (AT):* Any item, equipment, product or system which increases, maintains, or improves the functional capabilities of individuals with disabilities. AT promotes greater independence for people with disabilities by enabling them to perform tasks that they were formerly unable to accomplish, or had great difficulty accomplishing, by providing enhancements to or changed methods of interacting with the technology needed to accomplish such tasks. Examples of assistive technology include but are not limited to head wands, mouth sticks, on-screen keyboards, screen reader software, text-to-speech synthesizers, screen magnification, and refreshable Braille displays.

*Web sponsor:*  a University employee designated by the University President or a division executive as most closely associated with specific web sites or web content. Web sponsors are ultimately responsible for the accuracy and timeliness of web content to which they are assigned, as well as approving publication of web content. Sponsors may or may not actually make changes to their web sites directly.

*Editors:* a University employee who are designated to work with one or more web sponsors to add, update, or change new and existing web content on official University web sites. Editors may or may not have authorization to approve content for publication.

## Scope

The Web Accessibility Implementation Plan applies to the following web content:

* All web sites and web content contained within the URL [www.csuci.edu](http://www.csuci.edu)
* All academic program web sites contained within the *csuci.edu* domain (examples: art.csuci.edu, liberalstudies.csuci.edu, psych.csuci.edu)
* All web-based, non-instructionally related applications (examples: echoCI, Dolphin Email, Outlook Web Access, PeopleSoft/myCI, Symplicity, Hobsons, [www.csucijobs.com](http://www.csucijobs.com)). This does not include Canvas or Library systems.

The Web Accessibility Plan *does not* apply to:

* Student web sites (contained within the *studentweb.csuci.edu,* and other student web site internet subdomains)
* Personal faculty web sites (contained within the *faculty.csuci.edu* internet subdomain or on other domains)
* Faculty and student web sites delivered on the cikeys.com top-level domain, including any cikeys.com subdomains.
* Research project web sites (contained under the csuci.edu domain, other csuci.edu subdomains and/or external domains)
* Affiliate or auxiliary web sites regardless of domain (examples: ASI, University Glen)
* Canvas and any web content contained within these and other learning management systems (LMSs) used by CSUCI
* Library systems, including electronic reserves (eRes) and web-based databases
* Instructionally-related applications that are web-based or have a web component
* Instructionally-related materials provided on CSUCI or related web sites

The above listed areas should be addressed under ATI Priority 2: Instructional Materials and Instructional Websites Accessibility.

## Evaluation, Monitoring and Remediation of Websites

The Web Services team in ITS is assigned the responsibility for the evaluation, monitoring and remediation processes.

### Initial Evaluation

ITS shall maintain a baseline set of data in its reporting software.

### Evaluation and Monitoring

1. ITS shall create regular accessibility reports on a monthly basis to document web site accessibility using automated evaluation tools.
2. Manual checks of web pages for accessibility shall be completed at random and as needed by ITS staff.
3. Web sponsors shall be notified regularly via email of web content, sites or applications found not to be acceptably accessible. These notifications shall include an automatically generated report and may include a manual evaluation report.
4. ITS staff shall assist appropriate in verifying corrected content to ensure that it is acceptably accessible. Disability Accommodations and Support Services (DASS) assistive technology experts shall support ITS in verifying that web content and applications are acceptably accessible to users of assistive technology.
5. ITS shall maintain a database of official campus web sites and web sponsors and editors associated with those sites.
6. The record for each site in the database shall contain:
   1. The URL for the home page for the site;
   2. The name of the campus organization associated with that site;
   3. The campus division to which the organization is most closely associated with;
   4. The name of the web sponsor; and
   5. The name of any editors who edit, review, contribute or publish content to the site
7. New sites shall be added to the database at time of launch.
8. On a regular basis, the content database shall be provided to associated division executives for review, update, approval, and distribution to web sponsors and associated editors.

### Repair Prioritization, Timelines, and Support

In general, repair of existing web sites, web application and digital content shall be prioritized based according to the following guidelines:

* Those which have many visits/”hits” shall be repaired before those that have few visits
* Those which have been subject of official complaints filed with the University and/or the Office of Civil Rights (OCR) shall be repaired before those that have not received any official complaints
* Those with the least number of errors shall be repaired before those with more errors
* Those which are easiest to repair shall be repaired before those that are more difficult to repair

Web Services shall work with web sponsors to establish a timeline and deadline to make inaccessible web sites, applications and digital content acceptably accessible. Any repair timelines which exceed 30 days shall be documented, reviewed and approved by the appropriate division executive and the Assistant Vice President for Information Technology Services.

If the extent of repair requires an extension of the approved timeframe, the extension shall be documented and should include both the length of and rationale for the extension, and shall be approved by the appropriate division executive and the Assistant Vice President for Information Technology Services.

Web Services shall assist web sponsors and editors in repair of sites, applications and content. This assistance shall be primarily provided via training of web sponsors and editors in the evaluation, repair and remediation process.

As appropriate and as resources permit, Web Services shall assist web sponsors in direct repair of sites, applications and digital content.

Web sites, applications and digital content which has been repaired and authorized for re-publication shall be re-published in a timely manner.

## Accountability and documentation procedures

As sites, applications and content are updated, replaced or repaired, an automated evaluation process shall be used to evaluate the finished product.

Web content, sites and applications which have not been made acceptably accessible according to the ATI guidelines and assigned deadline may be temporarily removed from University web servers until appropriate corrective action has been taken by the associated campus organization.

When appropriate, ITS shall remove non-compliant web sites, applications and digital content, and report the removal to the appropriate web sponsors, editors, and division executives.

## Ensure accessibility in new web site design and authoring

To ensure accessible web site design and to facilitate remediation, all web sites on [www.csuci.edu](http://www.csuci.edu) shall use the official web content management (WCM) system, which is currently echoCI, powered by OmniUpdate.

The WCM shall be configured in such a way to generate accessible web code.

Content editors of web sites residing on [www.csuci.edu](http://www.csuci.edu) shall complete accessibility and WCM training prior to obtaining access to the WCM system.

It is recommended that all academic program web sites use the official WCM system to facilitate accessibility and support efforts.

### Training for web and digital content authors

The Web Services team in ITS shall administer a training program to help web sponsors and editors establish competency in creation of accessible web sites and applications.

ITS shall provide training for accessible authoring of digital content.

Training shall be offered regularly and in multiple modes, including self-paced and in-person instructor-led training opportunities. *Ad hoc* accessibility training shall be offered as resources are available.

### Registration process for new websites

1. Each CSUCI employee who requires access to create, edit or publish web content shall obtain written authorization from the manager for their associated organization/unit to be designated an editor. Written authorization shall be submitted to Web Services when requesting creation of or access to a new or existing web site.
2. Editors are added to content ownership database maintained by Web Services. Editors shall become reporting recipients of regular accessibility reports.
3. New web sites shall be added to the list of sites crawled by automated reporting tools by ITS.
4. Authoring tools which can create accessible content shall be used to create web sites.

### Testing of New Web Sites

ITS maintains a standardized testing process using automated testing tools, and performs manual testing as required.

1. Prior to new site launch, testing of new web content shall be performed by Web Services using automated testing tools.
2. Web Services shall report any discovered accessibility issues to the web sponsor and editors for remediation where required.
3. In conjunction with Procurement (and Disability Accommodations and Support Services as required), Web Services shall lead testing of web sites and applications associated with procurement of new services.
4. The testing process shall be documented on CSUCI web site though posting of this plan on the University web site.

## Alternatives & Exemptions

Non-compliant websites, web applications and digital content shall be delivered in an equally effective alternate format, and granted an exemption.

### Equally Effective Alternate Access

An Equally Effective Alternate Access Plan (EEAAP) shall be created for all non-compliant websites, web applications and digital content as needed and in accordance with CSUCI’s IT procurement practices. The EEAAP form shall document issues; stakeholders and responsibilities for providing equally effective alternate access (EEAA); how EEAA shall be provided; related communication processes; and repair/retrofit information as appropriate.

The EEAAP form shall be made available on the University web site (see Appendix).

### Exemptions

Exemptions shall be documented and approved via the EEAAP form and process.

### Complaint process to address web accessibility issues

Accessibility issues with web content, web applications or digital content may be reported to the Solution Center via email at [solution.center@csuci.edu](mailto:solution.center@csuci.edu) or via phone at 805-437-8552.

Complaints reported to the Solutions Center shall be assigned a work order to enable the person reporting the issue to track the status of the resolution of the issue.

Complaints shall be reviewed by Web Services team members in a timely manner. If the complaint cannot be addressed or resolved within a 14 day period, Web Services team members shall immediately escalate the complaint to the Assistant Vice President for Information Technology Services (AVP ITS) for review. Web Services team members shall document escalation in the assigned work order.

For escalated complaints, the AVP for ITS shall assemble a team of information technology, academic and disability support professionals to review the complaint and determine the course of action.

Upon review or resolution of the complaint, a report shall be provided to the complaint originator via the assigned work order.

## Communication Plan

Web Services shall be responsible for establishing an ongoing general campus communication plan that promotes web accessibility awareness.

1. Web Services shall maintain a campus accessibility website. This web site shall include information on who to contact for compliance assistance.
2. Web Services shall regularly notify web editors regularly regarding accessibility issues and training opportunities. Web Services shall broadcast these messages thru the WCM system and other formats as appropriate.
3. Web Services shall regularly notify web sponsors & editors that regular accessibility reporting takes place on a monthly basis, and who to contact if assistance is required.
4. Web Services shall regularly notify web sponsors & editors regarding the accessibility complaint process.

Plan tasks related to communication shall be documented in the Appendix of this plan.

## Administrative Process

The Web Accessibility Plan shall be reviewed annually by ITS and revised as necessary.

ITS shall complete web reports as required by ATI and submit them to the Chancellor’s Office in a timely manner.

Division executives shall be identified in all divisions to facilitate this process and notified to address accessibility shortcomings as they are uncovered.

## Plan Metrics

In addition to the data captured via the ATI annual report process, the following metrics shall be used to gauge progress. Metrics shall be included in an annual report on web accessibility.

| **Category** | **Metric / Key Performance Indicator** | **Assigned to** |
| --- | --- | --- |
| Evaluation | # of web pages that are checked using automated tools per month  Annual content inventory update is completed according to schedule | Web Services |
| New Development | Change in total # of web pages on [www.csuci.edu](http://www.csuci.edu) per fiscal year  Change in # of digital content documents (Word, Excel, PowerPoint, PDF) on [www.csuci.edu](http://www.csuci.edu) per fiscal year | Web Services |
| New Development | Change in # of video and audio files in Sharestream on an annual basis per fiscal year | Teaching & Learning Innovations |
| Monitoring | % of web sites that are in compliance according to monthly automated report | Web Services |
| Exemptions & Alternatives | # of VPATs received per fiscal year  # of technology procurements that include a web-based component or applications during the fiscal year  # of EEAAPs completed for technology procurements during the fiscal year | IT Strategy & Procurement |
| Training | # of users who have completed accessibility training per fiscal year  # of users who have used self-paced accessibility training resources per fiscal year | Web Services |
| Communication | Annual notification to editors is sent via echoCI or other electronic means according to schedule | Web Services |

## Plan Tasks

A list of regular plan tasks is located in the Appendix.

## About This Document

### Approved by

Peter Mosinskis

Interim Assistant Vice President for Information Technology Services and ATI Executive Sponsor for CSUCI

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## Version History

| **Version** | **Version Date** | **Author** | **Notes** |
| --- | --- | --- | --- |
| 1.0 | 2/27/2019 | Peter Mosinskis Daniel Martinez | Created new plan, using framework of 2014-2018 plan |

## Appendix

### Forms

[Download the EEAAP Form (in MS Word format)](http://www.csuci.edu/ati/sla/documents/equally-effective-alternate-access-release1-1.docx)

### Regular Plan Tasks

| **Task** | **Frequency** | **Assigned to** |
| --- | --- | --- |
| Send web training notification | Once per semester | Web Services |
| Create web site accessibility reports | Monthly | Web Services |
| Send web site accessibility reports to web sponsors | Monthly | Web Services |
| Review and update web content database | Annual, and as new sites are published. | Web Services and division executives |
| Complete ATI web annual report | Annual | Web Services |
| Document annual metrics according to plan | Annual | Web Services |
| Submit ATI web annual report to Chancellor’s Office | Annual | Director of IT Strategy |
| Send notification regarding regular accessibility reporting, accessibility complaint process, and accessibility assistance. | Annual | Web Services |