

# Framingham State University

Report to OCR on Web Accessibility and Functionality

OCR Complaint No. 01-17-2288

(Resolution Agreement dated: April 13, 2018)

Report Date: January 3, 2020

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### COMMITMENT TO ACCESSIBILITY

In compliance with <u>Section 504</u> of the Rehabilitation Act of 1973; Section 508 of the Rehabilitation Act (29 U.S.C. 794d), as amended in 1998; the Americans with Disabilities Act of 1990 and other related state and federal statutes, Framingham State University ("the University") seeks to treat all individuals with dignity and respect and to value people as its first priority. To this end, the University is committed to providing accessible information to all people wherever possible. The University will work to ensure that persons with disabilities have an opportunity equal to that of their non-disabled peers to access and utilize information technologies, and technology-related services, except where doing so would impose an undue burden on the University or require a fundamental alteration of our programs.

Framingham State University is committed to providing equal access to employment and educational opportunities for otherwise qualified persons with disabilities. The University has codified this commitment in the University's <u>Equal Opportunity Plan</u> (updated September 28, 2018).

Any member of the University community or any applicant for admission or employment who believes that he or she has been a victim of disability discrimination or harassment, or who alleges that the University has failed to provide reasonable accommodations, appropriate auxiliary aids and/or academic adjustments, may initiate a claim as outlined in the University's Complaint Investigation and Resolution Procedures located at Appendix 3 in the University's Equal Opportunity Plan.

### COMPLAINT AND RESOLUTION AGREEMENT OVERVIEW

The University was notified of OCR Complaint No. 01-18-2019 on November 21, 2017 regarding the accessibility of several top-level webpages on Framingham.edu.

Before OCR completed its investigation, the University expressed a willingness to resolve the complaint by taking the steps set out in a resolution agreement ("Agreement"). On January 5, 2018 the University signed the Agreement and a subsequent revised version of the Agreement (Appendix 1) offered by the Office for Civil Rights was signed on April 13, 2018. The Agreement was entered into voluntarily and did not constitute an admission of liability, non-compliance, or wrongdoing by the University.

Specific actions items for the University described in the Agreement included the following:

- Current Online Content and Functionality. By January 6, 2020, the University agrees that it will take all actions necessary to ensure that individuals with disabilities have an equal opportunity to participate in the University's programs and activities offered through the University's website or equally effective alternate access. To meet this commitment, the University will: develop a strategy for identifying inaccessible content and functionality for individuals with disabilities; develop a notice to persons with disabilities regarding how to request that the University provide access to online information or functionality; prominently post this notice on its home page and throughout its website; and develop a process to ensure that, upon request, inaccessible content and functionality will be made accessible in an expedient manner.
- New Online Content and Functionality. By July 6, 2018, the University will establish a plan to
  ensure that all new online content and functionality developed, procured, or used after the date
  of this agreement will be fully accessible to individuals with disabilities. The plan should include
  any staff training that may be necessary to ensure full implementation with the plan.

Reporting Provision. By January 6, 2020, the University will submit a report to OCR demonstrating
that it has fully satisfied the terms of this Agreement. The report will describe benchmarks the
University has reached and on-going efforts to maintain web accessibility and usability of the
University's website.

### CURRENT ONLINE CONTENT AND FUNCTIONALITY

### Working Group for Accessibility and Usability

On February 12, 2018, the University reconvened a Working Group on Accessibility and Usability. This team was originally established in 2014 and was reconvened in February 2018 specifically to monitor the auditing and compliance plan for web resources as it relates to accessibility and usability for persons with disabilities.

### Members of the team include:

- Chief of Staff/General Counsel
- Vice President for Enrollment and Student Development
- Chief Information Officer
- Executive Director of Equal Opportunity, Title IX, and ADA Compliance (Chair)
- Director, Education Technology and eLearning
- Communications Director
- Director of Marketing
- Associate Dean of Academic Success/ Director, Center for Academic Success and Achievement
- Manager, Digital Communications and Interactive Media
- Instructional Technologist
- Web Developer
- Full-time faculty

### Audit

The University contracted with *iFactory*, a Boston-based interactive agency that designed the Framingham.edu website in 2015, to conduct an accessibility audit of Framingham.edu. The audit included an automated report/scan of the entire site, as well as manual review of 30 top-level pages. The manual audit identified over 200 accessibility issues – most with multiple occurrences – and the automated full-site scan identified additional issues.

The reports divided issue types into several categories: those that can be fixed by a web editor, e.g. assigned web content editors at the University who have access to Percussion, the University's web content management system; those that can be fixed by a high-level system administrator; and those that require a Web Developer to repair. The Accessibility Audit Brief is available for review in Appendix 2.

### Web Team

The University's Web Team took on much of the responsibility for addressing identified accessibility issues in the audit.

For five months during 2018, the University's Web Developer and Web Development Contractor dedicated nearly all of their working hours to resolve all WCAG 2.0 A and AA development-related issues. This work was completed in October 2018.

In November 2018, the Web Developer began work on one of the most frequently occurring non-development issues on the Framingham.edu site – inaccessible PDF files. During the next five months, the Web Developer resolved more than 1,600 inaccessible PDFs on the website. During this time, a number of marketing-focused web projects were delayed to prioritize web accessibility.

### Web Accessibility Statement

The University provides the following Website Accessibility Statement, effective June 13, 2018:

Framingham State University is committed to providing access to all individuals, with or without disabilities, seeking information on our website. FSU will comply with the standards of the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0.

If, because of a disability, you are unable to access content on the Framingham State University website, have questions about the accessibility of content or technology used by FSU, and/or would like to report barriers to accessing any technology used by FSU, including this website, please use the form on the following page: Report a Web Accessibility Issue.

You may also email accessibility@framingham.edu with any questions.

The above information is prominently displayed via a link to "Accessibility Statement" in the footer of the University's homepage and each page throughout the website, including all subordinate pages owned and managed by the University.

Upon receipt of a report of inaccessible content, the employee responsible for monitoring this web activity will:

- 1) Contact the reporting individual to indicate receipt of the report of inaccessible content and
- 2) Review the content of concern to determine a strategy for remediation of the content.

Once the University has determined that content is not currently accessible several steps will be taken to address the matter. Primary importance will be placed on the correction or removal of the content to satisfy accessibility requirements. Technical matters will be managed by staff from the website team. The content editor will also be contacted and involved to address the root cause of the inaccessible content and determine corrective strategies to prevent further inaccessible content from being added. Once the University believes that the content has been sufficiently corrected, the material will be reposted in its accessible format. Should the original reporting party assert that the material remains inaccessible, they may choose to exercise complaint and resolution options under the University's Equal Opportunity Plan.

In the event that content is determined to not meet accessibility standards and where it would require undue burden or fundamental alteration to make the content accessible, the content will be promptly provided in an alternative accessible format.

### NEW ONLINE CONTENT AND FUNCTIONALITY

### Plan for New Content and Functionality ("the Plan")

The Plan (Appendix 3) was established June 29, 2018 and outlined the University's plans to ensure that all new online content and functionality developed, procured, or used by the University would be fully accessible to individuals with disabilities. These procedures and requirements apply to all University sponsored web pages and programs used to conduct University business and activities, including web resources used in courses. The Plan further outlined the implementation of training programs to support these objectives.

### Web Content Editor Training

The Manager of Digital Communications and Interactive Media, held two in-person group trainings and recorded a web-based training session for all users who have access to add content to Framingham.edu. All current web editors were required to participate in one of the trainings. Users who did not comply had their access revoked, which resulted in the number of editors across campus decreasing from 119 to 90.

Users who continue to upload inaccessible documents are contacted by the Web Team with instructions to correct inaccessible documents. Furthermore, department and area supervisors have been instructed that, in the event that web accessibility standards are not consistently met by a department or content manager, when posting to the Web site, the department will lose content management access and their pages may be deactivated until retraining is completed by the department (Appendix 4).

### Training Through the Education Technology Office ("ETO")

The Education Technology Office (ETO) supports faculty with their use of technology within the online and in-person learning space. Working closely with the Disability Services department on campus, ETO integrates accessibility into their consultations and workshops for all faculty and into their onboarding procedures for new faculty.

ETO offers workshops on accessibility throughout the academic year and supports the session with videos any employee can watch if they are unable to attend the scheduled workshop. Since the spring of 2018, 11 workshops on accessibility were delivered to at least 81 attendees representing at least 59 unique employees from approximately 27 departments across the University. These same topics are also part of their self-paced Blackboard course and orientation for new faculty.

<u>Videos</u>, <u>workshops</u>, <u>and other support resources</u> are made available to faculty and staff online.

The in-person workshops ETO delivered between fall 2018 and spring 2019 appear in the table below.

WORKSHOP TITLE	WORKSHOP DATE
Your New Ally for Accessibility	May 18, 2018
Create Accessible Word Documents	May 21, 2018
Creating Accessible Images with Alt Text	May 24, 2018

WORKSHOP TITLE	WORKSHOP DATE
Make PowerPoint Accessible	June 14, 2018
Create Accessible Word Documents	August 20, 2018
Make PowerPoint Accessible	August 23, 2018
Creating Accessible Images with Alt Text	August 24, 2018
Create Accessible Word Documents	September 18, 2018
Make PowerPoint Accessible	September 26, 2018
Making Images Accessible	October 3, 2018
Accessibility: Making Small Adjustments Can Make a Difference	January 3, 2019
How to Create Accessible Documents and Why	March 14, 2019

In addition to these on ground trainings, the ETO promotes and makes available comparable online training and instruction for employees to supplement or address particular needs of a department or individual.

### Blackboard Ally

In the fall of 2017, in an effort led by ETO, the University piloted the *Blackboard Ally* ("Ally") tool to assist with improving the accessibility of materials provided to students in the Blackboard Learning Management System (LMS). Ally was enabled in all new Blackboard course spaces as of May 2018. The integrated Ally tool is designed to provide <u>alternative formats</u> of documents and materials posted in the LMS; a byproduct of that process is an accessibility checker that flags uploaded content for accessibility issues prior to digital publication. Instructors use the accessibility flags, overall scores, and documentation to correct reported issues. The tool then creates alternative formats for content for students. Through the initial pilot of Ally, the most common issues with document design were identified and documentation and training materials were developed to address these needs. Workshops for faculty and staff around best practices with designing digital content were then offered. The work with this tool also shaped the University's approach to the campus-wide adoption of Ally in spring 2018.

Between the time Ally was piloted and implemented in 2017 and the present, ETO has helped to build awareness around accessibility and improved the overall accessibility score of course materials in Blackboard by 20%, moving the needle on the most severe issues including the following:

- Documents without Headings decreased by 14%
- Images without Alternate Descriptions decreased by 27%
- Tables without Headings within documents decreased by 5%

### **Procurement and Digital Acquisitions**

The procurement and use of third party digital applications have been and will continue to be modified to satisfy compliance with accessibility and usability standards. The University's Business Office has modified their procurement procedures for web-based public or student facing applications, requiring vendors to disclose their products' accessibility standards at time of bid and prior to purchase. Contracts or requests for third party applications are reviewed for these standards prior to purchase and implementation.

Ongoing work continues to implement the use and review of a products' <u>Voluntary Product Accessibility Templates ("VPAT")</u> prior to purchase. Currently, vendor's must affirmatively describe that their products meet WCAG 2.0 AA requirements and will work with the University to assure that any customized content continues to meet those standards.

Requests for exceptions require written justification, an explanation of any undue burden or fundamental alteration, and a description of how an alternate accessible format will be provided to users with disabilities. A model for an Equally Effective Alternate Access Plans ("EEAAP") is under review by the University's General Counsel in preparation for the development and adoption of a model plan/template that would provide further guidance and procedures to end users in the selection of their digital content. Once fully implemented, this tool will assure that accessibility considerations have been reviewed prior to the acquisition of external digital content or functionality. Requests for exceptions must be submitted to the President for consideration and approval by him/her or designee.

Free digital content being introduced into the University through open educational resources (OER) is addressed as previously described in the Blackboard Ally section.

### REPORTING PROVISIONS

### Summary of Benchmarks and Outcomes

Previously Noted in Report

As outlined previously in this report, the following benchmarks and outcomes have been achieved by the University:

DATE	BENCHMARK/OUTCOME		
February 12, 2018	The University reconvened a Working Group on Accessibility and Usability to		
	monitor the auditing and compliance plan for web resources as it relates to		
	accessibility and usability for persons with disabilities.		
February 2018	The University completed an accessibility audit of Framingham.edu. The audit		
	was performed by iFactory.		
Spring 2018 –	11 workshops on accessibility were delivered by ETO to at least 81 attendees		
December 2019	representing at least 60 unique employees from approximately 27		
	departments across the University.		
June 13, 2018	The University provided a Website Accessibility Statement, which is		
	prominently displayed via a link to "Accessibility Statement" in the footer of		
	the University's homepage and each page throughout the website, including		
	all subordinate pages owned and managed by the University.		
June 29, 2018	The University established a Plan for New Content and Functionality		

DATE	BENCHMARK/OUTCOME		
October 2018	The University's Web Team completed correction of all identified WCAG 2.0		
	A and AA development-related issues.		
November 2018 –	The University's Web Developer resolved more than 1,600 inaccessible PDFs		
March 2019	on Framingham.edu.		
March 2019	Twenty-nine web content editors had their access revoked. All web content editors are currently required to attend a training on web accessibility before receiving access to the content management system. Any web content editors who were previously assigned access to the content management system and failed to participate in an available training within the timeframe set by the University had their access revoked.		
December 2019	Overall accessibility score of our course materials in Blackboard has improved by 20% since 2017, moving the needle on the most severe issues including the following:  • Documents without Headings decreased by 14%  • Images without Alternate Descriptions decreased by 27%  • Tables without Headings within documents decreased by 5%		

### **Ongoing Efforts**

The University understands that full accessibility is a moving target and is committed to ongoing monitoring, training, and web maintenance in order to ensure the greatest level of accessibility and functionality for our community.

### SiteImprove

The University utilizes a software called SiteImprove that scans the Framingham.edu website for issues related to quality assurance and accessibility. In November 2017, our SiteImprove score for accessibility was a 64% (Appendix 5). The average higher education website scored about 62% at that time, according to SiteImprove. As of October 9, 2019, our SiteImprove accessibility score is a 99.5% (Appendix 6). We are down from nearly 2,000 inaccessible PDFs to less than 50.

### Web Team Monitoring

The University recognizes that accessibility is still not fully understood by all content creators on campus and departments continue to create inaccessible documents that are posted to the website. On a typical day, at least a dozen inaccessible PDFs are uploaded by content contributors.

The Web Team monitors our SiteImprove results and contacts departments that are uploading inaccessible documents. Either the Web Team, content creator, or web content editor corrects the inaccessible content. Additional training is made available to those users who uploading inaccessible documents.

### Personnel

To meet ongoing demands to ensure accessible web content and correct inaccessible content, the University has committed resources for two staff positions, one full-time and one part-time, to support these efforts.

### Web Developer/CMS Manager

On November 17, 2017, several days prior to being informed of the OCR Complaint, the University posted a job vacancy and began recruitment for the Web Developer/CMS Manager position ("Web Developer"). The successful candidate began employment in March 2018. The Web Developer performs and coordinates day-to-day administration of the University website and ensures availability, optimal performance, consistent appearance and functionality, ease of use, link functionality, WCAG 2.0 and 508 Standards compliance and conformance to University guidelines and policies. Following the acceptance of the voluntary resolution agreement in April 2018, the Web Developer began correcting individual documents hosted on the FSU web server to ensure acceptable accessibility. It is estimated that the Web Developer has corrected more than 1500 documents. The full job description is available in Appendix 7.

### Digital Accessibility Specialist

In October 2019, the University hired a part-time Digital Accessibility Specialist ("the Specialist") to design, produce, and modify electronic information and media to ensure accessibility for disabled persons, in compliance with WCAG 2.0 standards. This is a new position at the University. The Specialist works directly with faculty and staff to convert various documents and web content to accessible formats, and provides training on the production of new materials. The Specialist helps develop technical standards, guidelines and procedures for the University, works with the team to evaluate and provide accessible solutions for web-based and mobile products, and assists in educating and promoting the standard practice of building fully accessible content. The full job description is available in Appendix 8.

### **Training**

The University will continue to develop, promote, and archive trainings to encourage skill building in creating accessible content for online content creators.

An example of one such training is called "The Future Is Accessible". The Web Team is collaborating with ETO and the University's Center for Academic Success and Achievement to deliver a 50-minute presentation during the January faculty professional development day on January 8, 2020. The training description is as follows:

The best way to make a document accessible is to start with the source program, such as Microsoft Word, Excel, or PowerPoint. We'll address accessibility best practices when creating new documents, including heading structure, link text, alternative text, and more. What if the document is not available in its original format? We'll walk through how to check documents for accessibility and address some of the most common document accessibility issues without starting from scratch.

### CONCLUSION

The University is committed to accessibility, functionality, and usability and proactively endeavors to provide fully accessible web content to all users, regardless of physical ability. The University believes that accessibility and universal design should be the status quo, requiring neither corrective action or alternative formats of specific content. Until that time, the University will continue to develop and provide education and training to advance that goal and, where inaccessible content or functionality is identified, the University has a team and plan in place to provide swift remedy.

### **Resolution Agreement**

Framingham State University OCR Complaint No. 01-17-2288

To resolve the above-referenced complaint brought under Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990, the Office for Civil Rights (OCR) of the U.S. Department of Education and Framingham State University (University) enter into the following agreement. This agreement supersedes the agreement the University entered into on January 5, 2018. This agreement was entered into voluntarily and does not constitute an admission of liability, non-compliance, or wrongdoing by the University.

- 1. <u>Current Online Content and Functionality</u>. By January 6, 2020, the University agrees that it will take all actions necessary to ensure that individuals with disabilities have an equal opportunity to participate in the University's programs and activities offered through the University's website or equally effective alternate access. To meet this commitment, the University will: develop a strategy for identifying inaccessible content and functionality for individuals with disabilities; develop a notice to persons with disabilities regarding how to request that the University provide access to online information or functionality; prominently post this notice on its home page and throughout its website; and develop a process to ensure that, upon request, inaccessible content and functionality will be made accessible in an expedient manner.
- 2. New Online Content and Functionality. By July 6, 2018, the University will establish a plan to ensure that all new online content and functionality developed, procured, or used after the date of this agreement will be fully accessible to individuals with disabilities. The plan should include any staff training that may be necessary to ensure full implementation with the plan.
- 3. <u>Undue Burden and Fundamental Alteration</u>. This agreement does not require the University to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens. In those circumstances where the University can demonstrate compliance would result in such an alteration or burden, the University will ensure that, to the maximum extent possible, individuals with disabilities receive the benefits or services provided by the recipient.
- 4. <u>Technical Assistance</u>. OCR will make itself available to provide technical assistance to the University during the University's implementation of this agreement.
- 5. <u>Reporting Provision</u>. By January 6, 2020, the University will submit a report to OCR demonstrating that it has fully satisfied the terms of this agreement. The report will

<sup>&</sup>lt;sup>1</sup> "Accessible," for purposes of this agreement, means a person with a disability is afforded the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services as a person without a disability in an equally effective and equally integrated manner, within the same timeframes, and with substantially equivalent ease of use.

describe benchmarks the University has reached and on-going efforts to maintain web accessibility and usability of the University's website.

The University understands that by signing the agreement, it agrees to provide data and other information in a timely manner in accordance with the reporting requirement of this agreement. Further, the University understands that during OCR's monitoring of this agreement, if necessary, OCR may visit the University, interview staff and students, and request such additional reports or data as are necessary for OCR to determine whether the University has fulfilled the terms of this agreement. Upon the University's satisfaction of the commitments made under this agreement, OCR will close the case.

The University understands and acknowledges that OCR may initiate administrative enforcement, or judicial proceedings to enforce the specific terms and obligations of this agreement. Before initiating administrative enforcement (34 C.F.R. §§ 100.9, 100.10), or judicial proceedings to enforce the agreement, OCR will give the University written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach

This agreement will become effective immediately upon the signature of the University's representative below.

President President

Framingham State University

4(13/18)
Date

### APPENDIX 2



## **Accessibility Audit Brief**

Framingham State University Website

February 22, 2018



## Introduction

This brief summarizes the accessibility audit performed on the FSU website against <u>WCAG 2.0 AA</u>, the commonly accepted standard for accessibility compliance.

Site	https://www.framingham.edu/		
Automated scan	2411 pages		
Manual inspection	27 pages		
	https://www.framingham.edu/academics/ https://www.framingham.edu/academics/colleges/arts-and-humanities/ https://www.framingham.edu/academics/colleges/arts-and-humanities/fas hion-design-and-retailing/index https://www.framingham.edu/academics/colleges/arts-and-humanities/art- and-music/index https://www.framingham.edu/academics/programs/ https://www.framingham.edu/academics/programs/ https://www.framingham.edu/academics/programs/ https://www.framingham.edu/admissions-and-aid/ https://www.framingham.edu/admissions-and-aid/ https://www.framingham.edu/academics/continuing-education/ https://www.framingham.edu/academics/continuing-education/ https://www.framingham.edu/academics/continuing-education/undergradu ate-degrees/index https://www.framingham.edu/about-fsu/ https://www.framingham.edu/about-fsu/ https://www.framingham.edu/about-fsu/ https://www.framingham.edu/about-fsu/ https://www.framingham.edu/about-fsu/marketing-and-communications/c ampus-currents/campus-currents-12-18-17.php https://www.framingham.edu/about-fsu/marketing-and-communications/c ampus-currents/campus-currents-12-18-17.php https://www.framingham.edu/about-fsu/marketing-and-communications/c ampus-currents/campus-currents-12-18-17.php https://www.framingham.edu/academics/center-for-academic-success-and-achievement/peer-led-instruction/chemistry-si-leaders https://www.framingham.edu/academics/center-for-academic-success-and-achievement/peer-led-instruction/chemistry-si-leaders https://www.framingham.edu/the-fsu-difference/modern-spaces/index https://www.framingham.edu/the-fsu-difference/centers-and-institutes/center-for-inclusive-excellence/ligbt-resources/index https://www.framingham.edu/the-fsu-difference/centers-and-institutes/center-for-inclusive-excellence/ligbt-resources/index https://www.framingham.edu/the-fsu-difference/centers-and-institutes/center-for-inclusive-excellence/ligbt-resources/index https://www.framingham.edu/academics/continuing-education/course-sear ch-and-registration/spring-courses		

Manual inspection	10 third-party embeds
	https://www.framingham.edu/academics/henry-whittemore-library/books-journals-articles/interlibrary-loan-form/index.php https://www.framingham.edu/about-fsu/map https://www.framingham.edu/admissions-and-aid/financial-aid/ https://admissions.framingham.edu/portal/ug-events-oncampus https://reg.abcsignup.com/view/cal4a.aspx?ek=&ref=&aa=&sid1=&sid2=&as =5℘=18&tz=&ms=&nav=&cc=&cat1=&cat2=&cat3=&aid=FSU&rf=%20 https://www.framingham.edu/academics/continuing-education/non-credit-courses/mindedge-courses https://framingham.interviewexchange.com/static/clients/353FSM1/listJobs. jsp;jsessionid=1A691A8142A33E41938C1F68BBD59DB7;jsessionid=2B76D4 13354A6B9653433A7CFEDC93D6 http://www.fsurams.com/landing/index https://www.bkstr.com/framinghamstatestore/home/en https://framingham.sodexomyway.com/
Report of issues	https://docs.google.com/spreadsheets/d/1fSydI40KusoqeNMXq3XNXFO3alg Lt -P1lXmSsCho-s/edit?usp=sharing

## Methodology

To evaluate the site against the guidelines, we took the following steps.

- 1. Ran an automated scan on all pages using **SortSite**.
- 2. Manually inspected some pages using **WAVE** as an aid, checking for things automated tools cannot find.
- 3. Used **VoiceOver** (a screen reader) on some pages to uncover additional problems with the experience.
- 4. Compiled our findings into an actionable **report**.

## Caveats

While we strive to identify every possible accessibility problem, it should be noted that:

- 1. Accessibility guidelines involve interpretation and a variety of techniques. Others may interpret them differently and recommend different techniques.
- 2. Any new content or functionality that appears on the site after the date of this report may introduce new issues.
- 3. We're human, and may miss things. Having several tools, methods, and people aimed at accessibility is the best way to ensure comprehensiveness.

By correcting the issues in the report, the site's templates and functional components will be made

**vastly more accessible**. You will also learn about common accessibility problems and be able to keep the site accessible as you enter new content.

## How to Read the Report

The report has a number of columns to help categorize and act on each issue.

Short title for the issue. We <b>have</b> listed multiple instances of the same issue when they exist in different components. We <b>have not</b> listed multiple instances of the same issue when they appear in the same component on	
different pages, except when the issue concerns content.	
The block or module on the page that contains the issue	
The specific element within the component that has the issue	
The CSS selector of the element, for locating the issue in code	
Page where the issue was found	
URL of the page where the issue was found	
Further details about the cause of the issue and how to fix it	
The method or tool used to uncover the issue—either <b>WAVE</b> , <b>SortSite</b> , or <b>Manual</b>	
The criterion most directly affected	
<b>High</b> : Issues that directly violate WCAG 2.0 AA criteria and/or pose a serious roadblock to users. <b>Low</b> : Issues that don't directly violate WCAG 2.0 AA criteria and/or are an inconvenience to users.	
Who primarily needs to correct the issue— <b>Developer</b> or <b>Content Author</b>	
To be used by developers to estimate the time needed to fix the issue	

## How Accessible Is It?

The FSU website does many basic things right, but also poses significant challenges to users who require good accessibility. Here are a few of the most pervasive ones, which should be given attention immediately.

## **Keyboard Operability**

One of the site's biggest problems concerns keyboard operability. Users of assistive technology (such as screen readers) use the keyboard to focus on elements on the page and then act on them. The site must work equally well when using a mouse or keyboard. A few specific problems:

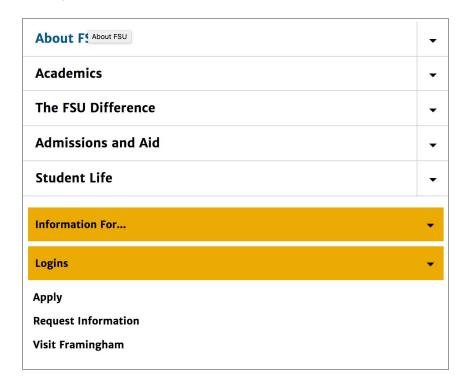
Some buttons are unable to receive focus and don't execute when pressing Enter.



The mega menus don't appear when focusing on the links, as they do on hover.



The mobile menu panel links invisibly receive keyboard focus at the end of the page when using a desktop device.



Elements that expand and collapse don't indicate to screen readers which state they are in.



## Headings

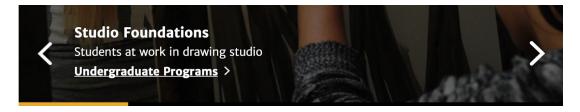
Proper headings create an understandable outline of a page. Many pages use headings out of sequence (like jumping from H1 to H3 or H4).

Personal. Motivational.

**Find Your Way** 

## **Academic Colleges and Divisions**

Some text that serves as a heading is not marked up as one.





Andrew Jung
Professor, Computer Science

Today, we are working on technology that could allow patients to monitor their glucose levels through an application on their cell phone that works in conjunction with an artificial pancreas."



**Bridgette Sheridan** 

Professor, History

Students credit her with providing them with the courage to participate more actively in class and with encouraging them to pursue fields related to history."



Dr. Robert Awkward

Program Coordinator and Advisor, Senior Instructor, Master of Human Resources

When you go through a professional master's program, you want to learn from people who are doing the work that you hope to do."

This component doesn't have a heading.



### **Images**

Some interface icons have no alternative text or incorrect alternative text.









**About FSU** 

### Title and aria-label attributes

Dozens of images and links have an unnecessary **title** or **aria-label** attribute, which either repeats the content contained in the link / alt attribute, or contains confusing text like the filename of the image. In all cases, it clutters the audio experience when using a screen reader.









```
▼ <a href="https://www.facebook.com/FraminghamStateUniversity" target="_blank" title="Footer link to Facebook">
        <img src="/Assets/uploads/Framingham/import/www.framingham.edu/fsu/img/facebook-@2x.png" alt="facebook" title="Framingham State on facebook">
    </a>
```

First-Year Programs

Meet Our Students and Faculty

Career Services and

Study Abroad
Inclusive Excellence
Centers & Institutes

Arts and Ideas

Modern Spaces

Environmentalism

Civic Engagement

Employer Relations

<a class="gtm-mm" href="/the-fsu-difference/arts-and-ideas/" title="Arts and Ideas" arial-label="Desktop Mega Menu Link to Arts and Ideas">Arts and Ideas</a>



<img src="/Assets/uploads/academics/ images/arts-and-humanities.jpg" alt=
"Arts & Humanities " title="arts-and-humanities.jpg" class="tile-image">

## **Next Steps**

We suggest the following next steps:

- 1. **Assign** a developer to correct the issues (whether at iFactory or on your team).
- 2. Have the developer **read** and **understand** the action necessary to fix each issue.
- 3. **Fix** the high priority issues first, then the low priority ones.
- 4. Have iFactory **verify** the issues have been fixed and do a **quarterly** check.



## Plan for Web Accessibility New Content and Functionality

OCR Complaint No. 01-17-2288

(Resolution Agreement dated: April 13, 2018)

Plan Date: June 29, 2018

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### **OVERVIEW**

Framingham State University ("the University") seeks to treat all individuals with dignity and respect and to value people as its first priority. To this end, the University is committed to providing accessible information to all people wherever possible. The University will work to ensure that persons with disabilities have an opportunity equal to that of their non-disabled peers to access and utilize information technologies, and technology-related services, except where doing so would impose an undue burden on the University or require a fundamental alteration of our programs.

Framingham State University is committed to providing equal access to employment and educational opportunities for otherwise qualified persons with disabilities. The University has codified this commitment in the *University's Equal Opportunity Plan*.

Any member of the University community or any applicant for admission or employment who believes that he or she has been a victim of disability discrimination or harassment, or who alleges that the University has failed to provide reasonable accommodations, appropriate auxiliary aids and/or academic adjustments, may initiate a claim as outlined in the University's Complaint Investigation and Resolution Procedures located at Appendix 3 in the University's Equal Opportunity Plan.

### **PLAN SCOPE**

The Plan for New Content and Functionality ("the Plan") outlines how the University plans to ensure that all new online content and functionality developed, procured, or used by the University will be fully accessible to individuals with disabilities. These procedures apply to all University sponsored web pages and programs used to conduct University business and activities, including web resources used in courses. The Plan further outlines the implementation of training programs to support these objectives.

This Plan for New Content and Functionality applies to the following content:

- 1. All new or modified web content and navigation structure for web sites contained within the framingham.edu domain.
- 2. All new web content developed or modified for FSU courses or organizations in Blackboard
- 3. Procurement of new electronic and information technology software, hardware, and services

In February 2018, the University formed a Working Group on Accessibility and Usability to address accessibility concerns for University sponsored web content. The Plan is an outgrowth of this group's work and will continue to be developed as the University remains vigilant in attaining its goal of equal opportunity access, or equally effective alternate access, for individuals to participate in the University's programs and activities offered through the University's website.

### **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 the nationally-recognized accessible technology standards of WCAG 2.0 Level AA and WAI-ARIA 1.0.

Editors: University employees who are designated to add, update, or change new and existing web content on official University web sites.

### BENCHMARKS FOR ACCESSIBILITY

In order to ensure the accessibility of our web site and web content, the University will comply with a set of nationally-recognized accessible technology standards.

### WCAG 2.0 Level AA and WAI-ARIA 1.0

The Web Accessibility Initiative (WAI) is an effort coordinated by the World Wide Web Consortium (W3C), an international standards organization for the World Wide Web. The WAI has published multiple guidelines for accessibility which address a variety of web-related technologies, including the Web Content Accessibility Guidelines (WCAG), and the Accessible Rich Internet Applications Suite (WAI-ARIA).

Adherence to these accessible technology standards is one way the University will ensure persons with disabilities are able to acquire the same information, engage in the same interactions, and enjoy the same benefits and services within the same timeframe as their nondisabled peers, with substantially equivalent ease of use; that they are not excluded from participation in, denied the benefits of, or otherwise subjected to discrimination in any Recipient programs, services, and activities delivered online, as required by Section 504 and Title II and their implementing regulations; and that they receive effective communication of the University's programs, services, and activities delivered online.

### WEB ACCESSIBILITY STATEMENT

The University provides the following Website Accessibility Statement (effective date June 13, 2018) on its site at: www.framingham.edu/about-fsu/accessibility/website-accessibility-statement:

Framingham State University is committed to providing access to all individuals, with or without disabilities, seeking information on our website. FSU will comply with the standards of the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0.

If, because of a disability, you are unable to access content on the Framingham State University website, have questions about the accessibility of content or technology used by FSU, and/or would like to report barriers to accessing any technology used by FSU, including this website, please use the form on the following page: Report a Web Accessibility Issue.

You may also email accessibility@framingham.edu with any questions.

The above information is prominently displayed via a link to "Accessibility Statement" in the footer of the University's homepage and each page throughout the website, including all subordinate pages owned and managed by the University.

### **USE OF TEMPLATES**

The University provides multiple templates to structure departmental web sites on Framingham.edu. These templates can only be edited by the University's web developers. All current templates are confirmed as compliant with WCAG 2.0 standards.

All new and modified templates will be created in a manner compliant with WCAG 2.0 standards.

Academic Affairs, in collaboration with the ITS-Education Technology Office (ETO) and the Center for Academic Success and Achievement (CASA), will provide faculty with accessible document templates for commonly used documents such as syllabi.

### **LEARNING MANAGEMENT SYSTEM - BLACKBOARD**

Authorized organization leaders may choose to use applications and layouts provide within the University's learning management system, Blackboard, or create new content designs. When setting up new content pages or applications it is understood that all provisions provided by WCAG 2.0 Level AA and WAI-ARIA must be satisfied.

A new application, Blackboard Ally has been enabled in all new Blackboard course spaces as of May 2018. Blackboard Ally evaluates documents that are uploaded to Blackboard and provides an accessibility score for each file. The tool explains what accessibility issues mean for students and leads course leaders through the steps needed to improve or correct the accessibility of these online course materials.

### PROCUREMENT AND THIRD PARTY APPLICATIONS

The procurement and use of third party digital applications have been and will continue to be modified to satisfy compliance with accessibility and usability standards. The Business Office has modified their procurement procedures for web based applications, requiring vendors to

disclose their products' accessibility standards at time of bid and prior to purchase. Contracts or requests for third party applications are previewed and reviewed for these standards prior to purchase and implementation.

Requests for exceptions require written justification, an explanation of any undue burden or fundamental alteration, and a description of how an alternate accessible format will be provided to users with disabilities. Requests for exceptions must be submitted to the President for consideration and approval by him/her or designee.

### **AUDIO/VIDEO CONTENT**

The University requires that all video published on the website by the University contain captions and, where necessary to communicate important visual elements of a video, a video description. For video, auto captioning may be utilized but must be reviewed and corrected for accuracy. Links to documents referenced in the video will be included in the captions and video description, as applicable.

Audio-only content must be accompanied by a written transcript.

### **EDITOR ACCESS**

Divisional and departmental leaders will designate editors for specific subordinate pages on Framingham.edu and will be responsible for ensuring that all editors in the University's content management system ("CMS") have completed the requisite training through the Web Team at the University. No new personnel responsible for developing, loading, maintaining, or auditing online content and functionality in the CMS will gain access to those systems without first completing web accessibility training as specified by the Web Team.

All current editors with access to the CMS to add or modify content on any University web sites must complete training on creating accessible documents and web content no later than fall 2018. Editors who have not completed training by that time will have editing access removed until such time that training has been confirmed as completed.

### **TRAINING AND RESOURCES**

The University recognizes the importance of ongoing accessibility training and will provide training to all appropriate personnel, including, but not limited to: content developers, administrators, staff, faculty and all others responsible for developing, loading, maintaining, or auditing online content and functionality.

The Web Team and ETO at the University shall administer a training program to help content authors and editors establish competency in the creation of accessible web site content and

applications. Training shall be offered regularly and in multiple modes, including self-paced and in-person instructor-led training opportunities.

The following trainings have been created and implemented within the timeframes outlined in the chart. The University will continue to develop and procure additional training to meet the needs of our community.

Training Title	Brief Description	Timeline	In-Person or Recorded
Create Accessible Web Content	General information about web accessibility standards, accessibility best practices, and technical guidance on how to create accessible web content within the University's content management system. Create headings, add descriptions to images, transform links into hyperlinks, and make tables accessible.	(February 2018 - present)	In-Person and Recorded
Create Accessible Documents	Accessible documents and multimedia. How to create Word documents and PowerPoints with headings, descriptions for images, descriptive links, and accessible tables. Demonstrate easy workflow for captioning videos made in Panopto.	(February – present)	In-Person

Training Title	Brief Description	Timeline	In-Person or Recorded
Blackboard Ally	Blackboard Ally is a tool to help us enhance the usability and accessibility of our course documents. Ally evaluates documents that are uploaded to Blackboard and provides an accessibility score for each file. The tool explains what accessibility issues mean for students and leads us through the steps needed to improve the accessibility of our documents.	(February – present)	In-Person
Create Accessible Word Documents	Learn how the new Blackboard Ally tool can help you to identify how accessible your documents are. We will also demonstrate how to create Word documents with headings, descriptions for images, descriptive links, and accessible tables. The presentation will focus on the Windows version of Microsoft Word.	(February – present)	In-Person
Creating Accessible Images with Alt Text	Alternative text, or "alt text" lets people perceive the information contained in an image if they can't see it. It also increases the searchability of a document. In this workshop, we will review different ways images are used in documents, and what the best practices are for associating alt text based on how the image is being used. We will look at different types of images, and how to associate alt text with them in Blackboard as well as in Microsoft Word.	May - Present	In-Person

Training Title	Brief Description	Timeline	In-Person or Recorded
Make PowerPoint Accessible	Learn how the new Blackboard Ally tool can help you to identify how accessible your documents are. We will also demonstrate how to make your PowerPoint presentations accessible.	June - Present	In-Person

### **MONITORING**

The University will continue its annual subscription to SiteImprove Content Suite to maintain, monitor, and optimize the University's websites for accessibility.

Web site administrators for the University will routinely review newly created content on Framingham.edu. New and modified content found to be not in conformance with the aforementioned accessibility standards will be removed until such time the content has been made acceptably accessible.

### APPENDIX 4

From: Accessibility

**Subject:** FSU Web Accessibility Initiative Update for Supervisors

**Date:** Wednesday, May 29, 2019 11:51:12 AM

Dear Department/Area Supervisor,

As you know, the FSU Web Team and the University's Working Group on Accessibility and Usability are working to ensure that all of our content on <u>Framingham.edu</u> is accessible. As of mid-April, all PDFs were converted to an accessible format but many more inaccessible documents are being uploaded every day by departmental Web content managers.

Under an agreement with the U.S. Department of Education Office for Civil Rights we must ensure that all NEW and UPDATED documents added to our Web site are accessible.

On an ongoing basis, we will be contacting Web content managers to inform them if they have recently uploaded inaccessible documents. If this is occurring in your area, you will be copied as well. However, we know that there are many other employees who create the content and documents that get uploaded to the Web site. **Therefore, we are asking you as a department/area supervisor to:** 

- (1) ensure all employees in your area are informed that all documents and digital content that will be shared electronically must meet accessibility standards,
- (2) provide all employees in your area creating digital content with access to and sufficient time to review training and instructional materials on creating accessible content, and
- (3) monitor digital content in your areas to confirm employees are meeting expectations around creating accessible content.

While a community-wide message will be sent as well, we're relying on our department/area supervisors to reinforce these expectations with their employees.

In the event that these accessibility standards are not consistently met by a department or content manager, when posting to the Web site, the department will lose content management access and their pages may be deactivated until retraining is completed by the department.

A number of resources are available to assist your department in creating accessible content. Please be sure to use the built-in accessibility checker in Adobe to scan your documents before uploading. Here is a quick tutorial on <u>creating and scanning PDFs for accessibility</u>. The University of Washington also has a great <u>tutorial series for beginners</u>. Feel free to share these resources with the individuals in your departments who may be creating documents for the web. The <u>Education Technology Office</u> is available for in-person assistance with creating accessible documents. General inquiries can be directed to <u>accessibility@framingham.edu</u>.

Thank you for helping Framingham State ensure equal access for all.

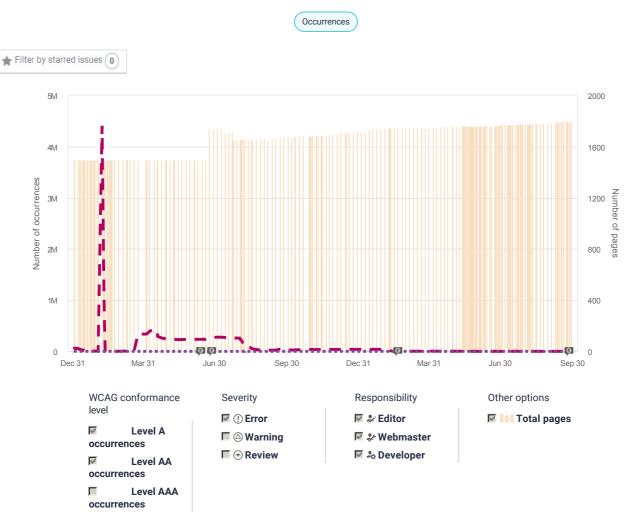
Sincerely,

Kim Dexter
Director of Equal Opportunity, Title IX, and ADA Compliance
Chair, Working Group on Accessibility and Usability

O Siteimprove

Site www.framingham.edu

### **Progress**



Annotations

### APPENDIX 6

## **O Siteimprove**

10/9/2019 12:55 PM

Site www.framingham.edu

### **Accessibility Overview**

Score d	letails (	a
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Progress in resolving Errors 2	<b>99.7</b> /100
Progress in resolving Warnings @	<b>98.7</b> /100
Percentage of pages with low Error rate	<b>99.1</b> /100

### Overall score 🕝



### Accessibility Score progress @



Annotations

### **APPENDIX 7**

### Framingham State University Position Description

Official Title: Contract Employee

Functional Title: Digital Accessibility Specialist

FLSA Status: Non-Exempt

Supervision Received: Manager of Digital Communications and Interactive Media;

Director of Marketing

Supervision Exercised: None

Last Revised: June 25, 2019

### General Statement of Duties:

Framingham State is looking for a knowledgeable and resourceful Accessibility Specialist to join our Web Team within the Marketing Department. The Accessibility Specialist designs, produces, and modifies electronic information and media to ensure accessibility for disabled persons and compliance with WCAG 2.0 standards. The Specialist works directly with faculty and staff to convert various documents and web content to accessible formats, and provides training on creating new materials. Will be responsible for identifying and suggesting potential solutions for accessibility barriers based on the W3C WCAG 2.0 standards and in compliance with the ADA, Section 508 and other accessibility related laws. This position requires the ability to communicate clearly and persuasively with executives, faculty, staff, web development partners, and the public. The Accessibility Specialist will help develop policies and guidelines for Framingham State, work with the team to evaluate and provide accessible solutions for webbased and mobile products, and assist in educating and promoting the practice of building content with accessibility in mind, including using accessibility tools and techniques.

### Essential Duties and Responsibilities:

- Designs, constructs, and maintains accessible web content on Framingham.edu
- Works with cross-functional teams to establish and implement web accessibility standards for the organization as a whole as well as for individual projects
- Develop and deliver educational resources about the importance of accessibility and technical accessibility tutorials, including training presentations for the internal University community
- Provides guidelines to faculty and staff for formatting documents and information to ensure that they can easily be translated into an alternate format
- Serves as a technical resource to faculty and staff to ensure that electronic information is provided in an accessible format

• Represent the University and support University teams in matters of accessibility, including selection of vendors and contractors

### Minimal Qualifications

- Bachelor's degree from an accredited institution
- 3+ years working or consulting in the field of web accessibility
- Understanding of the current accessibility environment in higher education
- Familiarity with legislative and industry-based standards such as W3C/WAI Web Content Accessibility Guidelines (WCAG) 2.0, WAI-ARIA, and ADA Section 508 guidelines
- Passion about current challenges in web accessibility
- Experience with assistive technology such as JAWS and NVDA, as well as accessibility features in Windows and Mac
- Collaboration and organization skills to work across multiple teams while functioning as a self-managing staff member.

### **Preferred Qualifications**

- Familiarity with modern front-end web development (including HTML, CSS, and JavaScript).
- Familiarity with commercial web accessibility evaluation and reporting tools.

### **APPENDIX 8**

### Framingham State University Position Description

Official Title: Staff Assistant

Functional Title: Web Developer/CMS Administrator

FLSA Status: Exempt

Supervision Received: Manager of Digital Communications and Interactive Media

Supervision Exercised: None

Last Revised: November 9, 2017

### General Statement of Duties:

The Web Developer/CMS Administrator is responsible for the day-to-day operations and technical support of the University's Percussion content management system. The Web Developer/CMS Administrator will identify opportunities to improve the web structure, layout, and web templates, as appropriate. In addition, this position will work with internal clients to evaluate their user needs and maximize opportunities in the university's web-based presence. This includes ensuring search engine optimization of information published from the content management system, in an effort to drive prospective students to the university website, and accurate gathering of metrics for analysis of website usage. Ensures that functional guidance for the creation and maintenance of web pages is consistent with applicable University guidelines and standards, and provides assistance with technical issues that need to be resolved. Scope of responsibility includes development, testing, implementation, integration and maintenance of other web applications based on need, and as deemed to be sustainable by the Manager of Digital Communications and Interactive Media. This position is also the primary contact for the University's managed web hosting vendor.

### Essential Duties and Responsibilities:

- Perform and coordinate day-to-day administration of the University website and ensure availability, optimal performance, consistent appearance and functionality, ease of use, link functionality, WCAG 2.0 and 508 Standards compliance and conformance to University guidelines and policies.
- Develop new pages, make changes to existing modules, develop views/widgets/content templates; manage roles/permissions, redirect/path aliases, taxonomies or tags; troubleshoot; and research new modules or Percussion enhancements.
- Set deadlines and assign tasks while collaborating with team members, internal clients, and vendors.

- Assist with the development of end-user documentation and training.
- Manage or perform all new website development, including definition of functional requirements, technical specifications, project management, design and working directly with third party product and service providers.
- Keep current with the latest trends in web development and design, both within and outside of the higher education space. Serve as a subject matter expert and advisor to University-wide committees and other ad hoc project teams.
- Report on web application usage and provide analysis to inform improvements.
- Respond to, address, resolve and fulfill all approved requests that are made of this position as they relate to any aspect of the website, integrations, and social media.
- Provide assistance to all departments with creation and maintenance of web pages using the content management system, and updates the content of academic department web pages.
- Assure that Framingham.edu and the Percussion content management system are at current revision levels and acceptable levels of performance.
- Accountable for ensuring that affirmative action, equal opportunity, and diversity are integrally tied to all actions and decisions in areas of responsibility.
- Provide backup to the portal administrator.
- Perform other related duties as assigned.

### Minimal Qualifications

- Experience with adaptive/responsive web design.
- A bachelor's degree or an equivalent combination of education, training and/or experience from which comparable knowledge, skill and abilities have been attained.
- Experience as an advanced-level user or administrator of a web content management system.
- Knowledge of current and emerging web and online communication trends, including best practices for delivering content to mobile devices.
- Knowledge of web design, development, and implementation, including basic composition and page layouts; and experience hand-coding HTML and CSS, as well as PHP and JavaScript.
- A demonstrated ability to bug-fix and solve browser compatibility issues.
- Strong problem-solving skills and the ability to pay high attention to detail and to work independently.

### **Preferred Qualifications**

- Experience with UI and UX design
- Proficiency in Adobe Creative Suite
- Working knowledge of search optimization strategies and application of Google Analytics, as well as experience implementing SEM pixels and Google Tag Manager triggers
- Excellent oral and written communication skills, interpersonal skills, a collaborative teamwork approach to work projects and a strong service orientation.