

# Digital Accessibility Policy

---

WHAT AND WHY

# Why Policy?

---

- Create a permanent, meaningful foundation
- Set the tone
- Establish responsibility
- Define the overall program
- Policy is (typically) enforced



# Alignment with Policy Environment

---



- ✓ Written formally or informally?
- ✓ Detailed or broad?
- ✓ Public or private?

# Civil Rights Law in Policy

---

- Americans with Disabilities Act
- Sections 503 and 504 of the Rehabilitation Act
- Relevant state and local law or policy

# Technical Standard

---

- Web Content Accessibility Guidelines (WCAG)
  - [WCAG 2.0](#) (2008) – Section 508
  - [WCAG 2.1](#) (2018)
    - [What's New in WCAG 2.1](#)
  - [WCAG 2.2](#) (2023) – Our recommendation
    - [What's New in WCAG 2.2](#)

# Standards in Law

---

- Section 508 of the Rehabilitation Act
  - Still refers to WCAG 2.0 AA
  - Has additional requirements
- Title II of the Americans with Disabilities Act
  - Refers to WCAG 2.1 AA
- State law and policy
  - Various standards

# Regulatory Update

---

- Spring Regulatory Agenda

- “The Department now plans to publish a Notice of Proposed Rulemaking (NPRM) to reconsider whether some of the regulatory provisions imposed by the April 24, 2024 rule could be made less costly.”

- Issued Interim Final Rule

- Meet to share concerns

# Policy Scope

---



- Public facing properties, internal?



- Web only or broader?
  - Mobile, documents, email?



- Exceptions or exclusions?
  - User-generated content
  - Legacy content
  - Exception process

# Common Policy Components

---

- Purpose
- Summary
- Feedback mechanism
  - Who to contact with questions or accessibility issues
  - Formal complaint process?
- Responsibilities
  - Of those who develop and update the policy
  - Those creating content, making decisions, etc.

# Policy Components Continued

---

- Related content
  - References to law or standards
  - Resources
  - Documentation
- CSU System

# Other Common Components

---

- Definitions
- Date(s) e.g.,
  - Effective date
    - All at once or in stages
  - Policy adopted, revised, revisited
- Review schedule, process

# Examples

---

- Kansas state government
- California State University-Long Beach
- New Jersey Department of Transportation
- Portland Community College



# Implementation Planning

---

MAPPING THE JOURNEY

# Purpose

---



- Operationalize your policy



- Define projects
- Establish priority for efforts
- Assign specific responsibility



# Typical Structure

---

- Long term
- Medium term
- Short term

# Many decisions

- ✓ What work needs to be done?
- ✓ Where do we start?
- ✓ When and how do we get people involved?
- ✓ How do we build sustainable systems?
- ✓ What can we do at the same time?



# Example: Phase One

---



- Secure an executive sponsor (or two)
- Form a steering committee
- Conduct program self-evaluation
- Develop draft policy and plans for adoption
- Draft a budget
- Identify needs for training and support
- Insert accessibility language into RFPs and contracts

# Example: Phase 2

---

- Hire or ID digital accessibility coordinator
- Begin an internal communication campaign
- Begin training by group
- Draft procurement policy for adoption
- Begin reviews for items going through purchasing
- Start to evaluate web content



# Example: Phase 3

---



- Continue training and support
- Continue communication campaign
- Expand procurement policy to all materials (purchased or free)
- Evaluate training and support outcomes
- Start a public PR campaign

# Discrete Projects

---

- Goal
- Activities required
- People responsible and necessary
- Dates (completion or duration)
- Progress measure(s)

# Project Example

---

- Goal:
  - Establish procurement task force
- Activities/key people/dates:
  - Set a meeting with leadership (me, 7/6)
  - Identify relevant groups (me, leadership, 7/8)
  - Identify thought leaders for each group and ensure inclusion (me, 7/ 10)
  - Create a draft invitation to come from leadership (me, 7/15)

# Project Example, cont.

---

- Activities/key persons/dates:
  - Meet with leadership to discuss proposed task force composition and share draft invitation (me, CIO, VP of Purchasing, ; 7/24)
  - Send invitations/delegations (combined leadership, 8/10 )
  - Schedule and host the first meeting (Me, task force members, CIO, VP of Purchasing, 8/30).
- Evaluation
  - Success rate: how many key people said “no”?
  - What gaps do we have in terms of representation?

# Plan Examples

---

- [Roane State Community College](#)
- [St. Vrain Valley Schools](#)
- [City of Evans, Colorado](#)
- [City of Colorado Springs, Colorado](#)
- [Monkee Boy web accessibility roadmap](#)
- [The State of Maine](#)

# Risk Analysis

---

- Helpful in setting priorities
  - Need to do a lot in parallel
  - Likely can't do enough in parallel
  - Need tie-breakers
- University of Michigan risk matrix



Thanks! I look forward to the rest of the series.

---

