Abstract

The SMSU Technology Accessibility Task Force (TATF) was convened during the Fall semester of the 2012-13 academic year. The TATF met six times during the semester. This document: 1) reviews the charge to the TATF, 2) identifies TATF membership, 3) summarizes TATF activities and 4) details the TATF’s findings on the topic of accessibility as it applies to technology-enabled services, outside of, and within, the SMSU environment. Finally, a set of recommendations for the University, some short-term in focus, and others with more of a longer term focus, are detailed.

Task Force Charge

In light of several mitigating factors, the University created a Technology Accessibility Task Force (TATF) during the Spring semester of the 2011-12 academic year. Among the factors leading to the TATF creation include federal and state legislation requiring that individuals with disabilities have equal access to “services” provided by public entities, the fact that a wide range of educational and administrative services are increasingly offered through the use of technology, and the growth of discrimination complaints and lawsuits being filed against higher education institutions for their use of inaccessible technologies by groups representing persons with disabilities. The TATF was charged with 1) assessing the background and issues regarding technology accessibility, 2) surveying external activities that impact the University, and 3) recommending solutions and any necessary university wide standards, procedures and policies to help assure the University is a fully accessible institution in regards to its use of technology.

Task Force Membership

Dan Baun (Administration representative & co-Chair)
Pam Ekstrom (Disability Resources representative & co-Chair)
Michelle Beach (SMSUFA)
Rhonda Bonnstetter (SMSUFA)
Rick Robinson (SMSUFA)
Tim Beske (MAPE/MMA)
Wanda Paluch (AFSCME)
John Alcorn (MSUAASF)
Alex Flores (SMSUSA)*

* SMSUSA only filled one of its allotted two TATF memberships
Task Force Activities

The Technology Accessibility Task Force (TATF) met six times during the Fall Semester in the 2012-2013 academic year. In addition, TATF members reviewed a variety of materials including information shared by invited presenters. A summary of the meetings and materials is provided below:

Meeting # 1 – September 17, 2012

Materials:
- a) Archived webex session entitled “The Accessible Campus”, [https://mnscu.webex.com/mnscu/lr.php?AT=pb&SP=TC&rID=30859257&rKey=b060d98fbe0ab15&act=pb](https://mnscu.webex.com/mnscu/lr.php?AT=pb&SP=TC&rID=30859257&rKey=b060d98fbe0ab15&act=pb) a presentation to the 12/9/11 MnSCU quarterly CIO meeting by Sheri Steinke, Director of Online Learning, Normandale Community College and Boe Barlage, Instructional Technologist, Normandale Community College. See Appendix A for presentation slides.
- b) “Dear Colleague Letter” issued on June 29, 2010 to College and University Presidents by the U.S. Department of Justice, Civil Rights Division and the U.S. Department of Education, Office of Civil Rights. See Appendix B.

Meeting Summary:
TATF members had a presentation from Renee Hogoboom, Associate Director of Diversity & Equity for the MnSCU System Office. A Q & A session followed. Meeting highlights included a review of Federal government communications regarding accessibility, a review MnLearning Commons and MnOnline activities, including the Web Accessibility Group addressing such issues as captioning, and Minnesota State Government activities including the development of technology procurement standards that address accessibility.

Meeting # 2 – October 1, 2012

Materials:

Meeting Summary:
TATF members identified various technology-enabled processes, activities and tools at SMSU that are considered to be in the scope of accessibility requirements. Examples included technology-supported instruction, the University website, electronic forms, campus facilities such as computer labs and widely utilized electronic services such as the campus e-mail system.

Meeting # 3 – October 22, 2012

Materials:
- a) “SMSU Tech Talk” – Presentation notes from Darwin Dyce. See Appendix D.

Meeting Summary:
TATF members had presentations from Darwin Dyce, Physical and Health Disability Consultant, SW/WC Service Cooperative and Karin Marquardt, Vision Consultant, SW/WC Service Cooperative regarding
some of the tools and services utilized by K-12 schools in the region to address accessibility needs. Demonstrations and a Q & A session were held.

Meeting # 4 – October 29, 2012

Materials:

Meeting Summary:
Presentations were given to the TATF by Jim Lilleberg, Information Technology Specialist and Jacob Speer, Web Services Information Officer regarding techniques and tools for making documents and the SMSU web site pages accessible. Demonstrations were provided.

Meeting # 5 – November 19, 2012

Materials:
   a) TATF Recommendations Draft #1
   b) “Implementing an Accessibility Initiative across the Institution” session held at 2012 Educause on Thursday, November 8, 2012. See Appendix E.
   c) Video entitled “IT Accessibility: What Campus Leaders Have to Say” http://www.youtube.com/watch?v=tnsB6YCHVXA

Meeting Summary:
Baun reviewed details of a session on Accessibility initiatives he attended at the Educause Conference in Denver in early November.

TATF members conducted a detailed review of a first draft of a TATF Recommendations document.

Meeting # 6 – December 10, 2012

Materials:
   a) TATF Recommendations Draft #2

Meeting Summary:
TATF members reviewed a second draft of a TATF Recommendations document and made adjustments to the document for presentation to the University community. Beyond Draft #2, some additional drafts were circulated via e-mail to TATF members for additional review and comment prior to issuance of the final report.

Findings – External Review

1. The provision of any service by public entities that uses technology and is inaccessible to individuals with disabilities is considered discrimination by the federal Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973 (Section 504)
unless those individuals are provided accommodations or modifications that permit them to receive all the benefits provided by the technology in an equally effective and equally integrated manner.

2. The MnSCU system has a policy -- 1B.4 “Access and Accommodation for Individuals with Disabilities” [http://www.mnscu.edu/board/policy/1b04.html](http://www.mnscu.edu/board/policy/1b04.html) that addresses the System’s commitment to ensuring that programs, services and activities are accessible to individuals with disabilities.

3. Several higher education institutions (e.g., Penn St. and Arizona St.) have recently been the subject of legal complaints filed by advocates of persons with disabilities for using technology-enabled services that discriminated against persons with disabilities. In the case of Penn St., a settlement between the University and the National Federation of the Blind was reached [http://accessibility.psu.edu/nfbpsusettlement](http://accessibility.psu.edu/nfbpsusettlement).

4. In 2009, legislation (Chapter Law 131/HF1744) was signed into law on May 21, 2009 directing the adoption of accessibility standards for use by the State of Minnesota. The Office of Enterprise Technology adopted its most recent accessibility standard on April 29, 2011. The reason for the standard is to improve the accessibility and usability of information technology products and services for all State of Minnesota government end-users. [http://mn.gov/oet/policies-and-standards/accessibility/](http://mn.gov/oet/policies-and-standards/accessibility/)

5. Legislation was introduced in the Minnesota 2010 Legislature, but not adopted, which would have assessed higher education institutions a fine of $500, plus reasonable attorney fees, costs and disbursements, for individual accessibility violations.

6. Several initiatives are underway across the MnSCU system to address accessibility concerns. One such example is a program at Minnesota State University, Mankato initiated to add captioning to all videos used in course and services delivery. Other institutions diligently implementing captioning include Normandale Community College and Hennepin Technical College. In addition, Minnesota Online has created a Web Accessibility Group.

7. Individual MnSCU institutions have varied approaches to addressing technology accessibility. While most, if not all, of the institutions provide services for students with disabilities, it is evident that most do not have separate policies that address technology accessibility.

8. Across the nation, higher education institutions are pursuing aggressive strategies to address accessibility needs. The following video entitled “IT Accessibility: What Campus Leaders Have to Say” was premiered at the 2012 Annual Educause conference in Denver on November 7th. [http://www.youtube.com/watch?v=tnsB6YCHVXA](http://www.youtube.com/watch?v=tnsB6YCHVXA). Among specific strategies, the University of Minnesota has a Usability Services Office within its Office of Information Technology that tests tools and services for accessibility. The University of Illinois and Pennsylvania State University are two examples of institutions that have comprehensive Technology Accessibility initiatives. Also, the California State University System has implemented an Accessible Technology Initiative. [http://www.calstate.edu/accessibility/](http://www.calstate.edu/accessibility/) across its system. The CSU System has adopted a Disability Support and Accommodations policy which reads “It is the policy of the CSU to make information technology resources and services accessible to all CSU students, faculty, staff and the general public regardless of disability.”

9. It is becoming a common acceptance that accommodation is not equivalent to accessibility. Indeed, it is becoming best practice for higher education institutions to consider the level of accessibility for any technology-enabled service or product prior to deployment and utilization rather than attempting to accommodate the needs of specific users after the fact.
Findings – Internal Review

1. SMSU currently has 112 students with one, or more, documented disabilities. A summary of disability types and the number of currently enrolled students with each disability type is provided below:

   - Learning Disability – 27
   - Blind – 1
   - Hard of Hearing – 4
   - Mental Impairment – 3
   - Acquired/Traumatic Brain Injury – 5
   - Systemic – 11
   - Mobility – 36
   - Aspergers – 1
   - Autism Spectrum – 2
   - Psychiatric – 15
   - Attention Deficit – 33
   - Speech – 1

2. Through the Office of Disability Resources (ODR) and Information Technology Services (ITS), SMSU strives to accommodate students with verified disabilities by consulting with faculty on individual student needs, supporting faculty and staff in making services (e.g., electronic documents) accessible, providing access to specialized hardware and software tools to students with disabilities, and offering services such as a Testing Center. Information is provided in the Student Handbook regarding services available from the ODR.

http://www.smsu.edu/administration/studenthandbook/?id=8139

3. SMSU’s existing policies and procedures that pertain to technology-enabled services accessibility are limited. SMSU does have a “Reasonable Accommodation policy – P009” that encourages the employment and promotion of any qualified person, including persons with disabilities. Information regarding the University’s ADA Coordinator and policies regarding language to be used on printed materials regarding reasonable accommodation for University hosted events is included in the Student Handbook.

http://www.smsu.edu/administration/studenthandbook/?id=8129

4. The University, through the Student Technology Fee process, has established a pool of funds to support the purchase of hardware and software that meets the needs of students with disabilities. The pool was initially established in FY 2010 at a level of $5,000. Funding has been replenished once since the original establishment date. Some of this software (e.g., screen readers) is made available in labs. Occasionally, hardware and software is purchased to support individual learner needs.

5. Accessibility needs in physical environments (e.g., computer labs, testing centers) where technology is utilized is taken into account in facility, furniture and equipment design.

6. SMSU’s Web Services Office strives to ensure that the University web site meets current accessibility standards. The following validation tool is used to test content put on the web site by staff http://www.totalvalidator.com/.

7. A significant amount of materials and videos posted, or linked to, on the SMSU web site by persons other than Web Services Office staff are not considered to be accessible.

8. Most electronic versions of documents developed for public consumption by faculty and staff at SMSU are not considered accessible.
9. SMSU has access to a variety of hardware and software that can be utilized to make technology-enabled services accessible. However, these tools are not widely publicized or in some cases are only available on a limited basis to faculty and staff.

10. By and large, SMSU faculty and staff are not well versed in the methods of making technology-enabled products and services accessible nor do they have access to the resources (e.g., technical expertise, software) to support them in such efforts.

11. SMSU ITS and Web Services staff have attended workshops on making documents and videos accessible.

**Short-Term Recommendations (FY 2014)**

1. A campus-wide awareness campaign on the topic of accessibility to technology-enabled services should be planned and conducted. The campaign should use multiple communications mediums. The awareness campaign should dovetail with training strategies regarding technology accessibility (see #4).

2. An initial high level audit/inventory of existing technology-enabled tools, practices and services currently in use across the University should be conducted. The audit/inventory should be used to identify areas of high concern that would be targets for short-term remediation activities. The allocation of funding to support an audit/inventory by an independent consultant should be considered.

3. Sufficient funding should be allocated to procure a campus-wide license of Adobe Pro software to support the development of accessible electronic documents. *(Note: funding has been earmarked in the FY 2013 Student Technology Fee and Information Technology Services budgets to begin this process for the current fiscal year. However, actual procurement is pending completion of negotiations with Adobe for a university-wide license as the program used for budgeting purposes has been discontinued by Adobe. MnSCU has been directly involved in these negotiations.)* Previously, the practice at SMSU has been for departments to use departmental budgets to purchase individual user Adobe Pro licenses for faculty and staff desiring the software.

4. Develop and make available training materials and programs for SMSU faculty and staff. These programs should complement the recommended awareness campaign (see #1) by focusing on: a) strategies for implementing technology accessibility and 2) developing competence on the use of specific tools (e.g., Adobe Pro, video captioning tools). It is suggested that partnerships with other MnSCU institutions be explored for this activity.

5. A plan should be developed, and funding allocated, to help the University community with 1) identifying video resources that do not currently have captioning and accompanying transcripts and 2) take steps to caption and/or provide transcripts for all videos used whether made available for web-based viewing or in-house viewing. It is recommended that the University closely model the initiative Minnesota State University, Mankato began in 2011.

6. Train pertinent SMSU staff by the end of FY 2014 on the use of voluntary product accessibility templates (VPATs) or similar tools and methods to support procurement processes that meet technology accessibility goals.

7. Conduct a survey of students currently served by Disability Resources to assess current University performance in providing accessible technology-enabled services.
Long-Term Recommendations

1. SMSU should consider adopting a policy, or at a minimum, adopt a University-wide strategic direction, that indicates its commitment to provide access to information technology resources and services to individuals with disabilities. Any policy or strategic direction adopted shall be consistent with existing MnSCU Policy 1B.4 and federal and state legal requirements.

2. A University wide process should be implemented to ensure that accessibility is incorporated into campus-based programs and services that use technology. At a minimum, these services should include: a) the SMSU web site (including locally developed web applications and e-forms), b) technology-enabled instruction, and c) technology tools and technology-enabled services procurement.

3. One potential step to accomplish the process outlined in Recommendation #2 is to form cross-functional teams to develop work plans for ensuring accessibility is taken into account in each program or service area. Work plans would incorporate: a) a review of current applicable standards and/or best practices that enable accessibility; b) an audit/inventory of current University practices, tools and services; c) recommended changes to current University practices, procedures, processes and policies that can increase accessibility; and d) recommended action steps to pursue including any employee training needs, resource acquisition, and position description changes.

4. Upon completion of work plans suggested in Recommendation #3, the plans should be assigned to the appropriate organizational unit to implement and operationalize. The assigned organizational unit can request representation from other units for any project team(s) to be developed to help complete the work plans.

5. Set priorities among service areas and create obtainable targets for technology accessibility for specific service areas (e.g., instruction, web site, student services tools). As an example, targets could be established that by the end of the 2014-2015 academic year 75% of courses offered online will meet predetermined accessibility standards and 85% of online courses would meet the standards by the end of the following year. As part of this target setting process, the University may want to consider where priorities should be. For example, technology-enabled student services tools may have the highest priority or online courses may be given a higher priority than courses taught on-site since students attending courses on campus have access to services not readily available to off-campus students.

6. On an annual basis, each organizational unit that is assigned a work plan shall complete and submit a report to the President’s Cabinet regarding implementation progress and maintenance activities. It is recommended that these reports be integrated into existing reporting mechanisms and formats currently used by faculty and staff as much as possible.

7. Notwithstanding the above recommendations, the University should investigate the creation of a service unit charged with conducting “accessibility evaluations” of technology tools and technology-enabled services before they are procured and deployed for University community use. Given limited resources, it is suggested that such a service unit could involve a partnership with other institutions.

8. In conjunction with the above identified efforts, the University should develop and publicize, on an ongoing basis, information resources that promote technology accessibility and highlight best practices for the University community to follow.

9. Continue to fund a “Disability Services Technology Fund” (note: currently funded solely through Student Technology Fee at a level of $5,000 and replenished on an as needed basis—typically every 2 years) which has been used to procure hardware and software necessary to support students with disabilities.