Compliance or Bust

Accessibility, Office of Civil Rights, and Seton Hall University

Elizabeth Leonard
SETON HALL UNIVERSITY LIBRARIES

Hosted by ALCTS, the Association for Library Collections and Technical Services
SETON HALL UNIVERSITY (NJ)

- One the country’s leading Catholic Universities
- Go Pirates!
- 10,000 students - undergraduate/graduate
- Opening Medical School July 2018
BACKGROUND

Seton Hall University Libraries history of meeting needs of persons with disabilities

• 1:1 meetings with students
• Facilitate students providing feedback to Vendors to help them improve platforms (including EBSCO and ProQuest)
• Support ensuring equal access to materials- articles, ebooks
  – Create accessible materials for students as needed
• Relationship with Disability Support Services
• Physical design of library Information Commons
  – Physical design
  – Accessible workstations
• Attention to Section 508 and website
• Services
  – OCR on MFD devices
  – Get it @ Circ! – will pull items from stacks for anyone
  – ILL Print articles- will pull, scan, and email articles in print journals
Department of Education, Office of Civil Rights (OCR)
- Contacted Seton Hall University in May 2017
  - 90 Days to respond
- Addressing web presence
  - “Law on the books” - Section 508 of the Rehabilitation Act of 1973
  - January 2017 - update Section 508 to include WCAG 2.0 AA standard
- University web department, Library, Athletics tried to comply before VRA signed
  - Too much to do
- Set up Voluntary Resolution Agreement
  - Signed September 2017
“...a written resolution agreement that describes the specific remedial actions that the recipient will undertake to address the area(s) of noncompliance identified by OCR. The terms of the resolution agreement, if fully performed, will remedy the identified violation(s) in compliance with applicable civil rights laws.”

https://www2.ed.gov/about/offices/list/ocr/complaints-how.html?exp=4
WHAT DOES VRA ENTAIL?

- Audit
- Notice
- Corrective Action Plan (CAP)
- Plan for New Content
- Training

Hosted by ALCTS, the Association for Library Collections and Technical Services
Audit

• Reviews public website by independent third party company
  – agreed upon by OCR and institution
• Benchmark used (WCAG 2.0 AA)
• Automated testing
  – Corporate platform
• Manual testing
  – Manual check
  – WAVE tool
• Institution may be required to seek “input from members of the public”
• Report issued- list of non compliant areas
  – guides Corrective Action Plan
• Date to be performed/completed negotiable with Institution; generally no more than 180 days after signing of VRA.
Notice

• Public Notification of how inaccessible content will be reported to webmaster
• Post notice on every page
• Documentation
• Designate Web Accessibility Coordinator who ensures
  – content is accessible
  – facilitate training
  – Perform accessibility audits
  – Individual to receive notification of web accessibility violations
Report a Web Accessibility Issue

Your Name

First Name: 
Last Name: 

Your Email

Phone

Please Describe the Accessibility Issue *
Corrective Action Plan

- Plan designed to address all inaccessible content and functionality identified during the Institution’s audit.
  - May include legacy pages; dependent upon VRA agreement
- Modify existing content
  - How much is based on your Agreement.
  - Some “archival” content may be left as is unless updated or modified.
- Date ranges from 30 to 60 days after completion of Audit.
- Must submit to OCR for approval.
Plan for New Content

• How to ensure new content meets accessibility standards.
• Implementation plan
• Adopt policies to ensure future content continues to be in compliance
  – third party systems (e-resources) may be included
• “Undue Burden” or “Fundamental Alteration”
  – Equally effective alternative access
• Documentation
Training

• Training of “appropriate personnel”:
  – Content Developers
  – Webmasters
  – Anyone responsible for developing, maintaining, or auditing web content and functionality
  – Library: anyone writing/updating LibGuides, website, Finding Aids, or other public facing content

• Timeline: immediate and ongoing throughout the process

• Semiannual training reports submitted to OCR
Post VRA changes
Review website

- May-August 2017
  - Reviewed every page of public content
  - Create “tiering” of errors
    - Tier 1: Review of pages by librarians and staff comfortable with technology; identify errors
    - Tier 2: Basic errors- HTML, missing tags
    - Tier 3: Developer or Vendor level errors
UNIVERSITY LEVEL WEBSITE USERS WHO MAY HAVE DIFFERING ABILITIES

• Visual
  – Low or non sighted
  – Color blindness

• Learning Disabilities
  – Dyslexia

• Physical disabilities
  – Movement disorders
    • Unable to use mouse- need to be able to keyboard through a page
  – Hearing disorders
    • Subtitles, transcripts

• Senior Citizens
  – Challenges with movement and neuroplasticity
  – Keep content paths simple
Twelve guidelines based around four Principles- POUR

- Perceivable
  - Content must be able to be perceived by one of the senses

- Operable
  - Interface cannot have functions or operations that the user cannot perform

- Understandable
  - Information and Operations cannot be beyond users’ understanding

- Robust
  - Content and interface must be able to support a variety of technologies/tools now and in the future.
CHANGE THE LIBRARY TO BETTER SUPPORT PERSONS WITH DISABILITIES

• Single “disability liaison” vs. team approach
  – Team means more availability

• Develop strong relationships and workflows with Disability Services on your campus

• Focus groups, interviews, discussions with students with disabilities
  – Just because a website meets accessibility standards does not mean it is accessible, especially with specific accessibility tools.

• Learn what it is like to be differently abled
  – Download a free screen reader (Chromevox) and try navigating your site with the reader alone.
WORK WITH VENDORS

• Vendor content may be “your content” especially when it hosts material created by your Library.
  – Springshare LibGuides
  – Institutional Repositories
  – Website (Drupal, Springshare)
  – Exhibition/Archive software (Omeka, Preservica, ArchivesSpace)

• Note: our vendors were very supportive of the need to meet WCAG 2.0 AA standards.
ACQUISITIONS/LICENSURE

• Voluntary Product Accessibility Template (VPAT)
  – Adherence to Section 508 Requirements
  – No longer enough

• Add language to Licenses (reach out to Consortia to request language added to contracts)
  – http://www.arl.org/focus-areas/accessibility/2548-model-licensing-accessibility#.WeOzUmhSw2w
  – http://liblicense.crl.edu/licensing-information/model-license/

• Key language
  – “If the product does not comply, the Licensee has the right to adapt the Licensed Materials in order to comply with federal and state law.” (Section 5.1.E, http://liblicense.crl.edu/licensing-information/model-license/)

• E-resource vendors that cannot comply must be
  – removed from holdings - or-
  – approved as an exception by President of the University or her designee
EDUCATION

- http://a11yproject.com/ (A11y=Accessibility)
- https://github.com/mgifford/a11y-courses
- https://webaim.org/
- https://www.w3.org/WAI/intro/wcag
QUESTIONS?

ELIZABETH LEONARD
ASSISTANT DEAN, INFORMATION TECHNOLOGIES AND COLLECTIONS SERVICES
SETON HALL UNIVERSITY LIBRARIES
ELIZABETH.LEONARD@SHU.EDU